

EXHIBIT

59

IN THE UNITED STATES DISTRICT COURT.
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION) MDL No. 2804
OPIATE LITIGATION)
)
)
THIS DOCUMENT RELATES TO:)
Track Nine: Tarrant County,) Case No.: 17-md-2804
Texas)
)
)
(Case No. 1:18-op-45274-DAP)) Judge Dan Aaron Polster

ORAL AND VIDEOTAPED & VIA ZOOM
VIDEOCONFERENCE DEPOSITION OF
JENNIFER GILLEY
AUGUST 18, 2023

ORAL AND VIDEOTAPED & VIA ZOOM VIDEOCONFERENCE,
DEPOSITION OF JENNIFER GILLEY, produced as a witness at
the instance of the Defendants and duly sworn, was taken
in the above-styled and numbered cause on Friday,
August 18, 2023, from 10:05 a.m. to 3:18 p.m., before Kari
Behan, CSR, RPR, CRR, a Texas certified machine
shorthand reporter, at the offices of Greenberg Traurig,
LLP, 2200 Ross Avenue, Suite 5200, Dallas, Texas 75201,
pursuant to the Federal Rules of Civil Procedure and the
provisions stated on the record
herein.

Job No. 6059372

<p style="text-align: right;">Page 2</p> <p>1 A P P E A R A N C E S</p> <p>2 FOR THE PLAINTIFF (REMOTELY):</p> <p>3 LEILA AYACHI, ESQ.</p> <p>4 - and -</p> <p>5 ALEX ABSTON, ESQ.</p> <p>6 - and -</p> <p>7 SADIE TURNER, ESQ.</p> <p>8 10940 W. Sam Houston Parkway N.</p> <p>9 Suite 100</p> <p>10 Houston, Texas 77064</p> <p>11 (281) 748-7693</p> <p>12 alex.abston@lanierlawfirm.com</p> <p>13 sadie.turner@lanierlawfirm.com</p> <p>14</p> <p>15 FOR THE DEFENDANTS, THE KROGER CO., KROGER LIMITED</p> <p>16 PARTNERSHIP I, KROGER LIMITED PARTNERSHIP II, KROGER</p> <p>17 TEXAS LP (REMOTELY):</p> <p>18 AARON BOONE, ESQ.</p> <p>19 BOWLES RICE LLP</p> <p>20 Granville Square</p> <p>21 Suite 400</p> <p>22 Morgantown, West Virginia 26501</p> <p>23 (304) 285-2500</p> <p>24 aboone@bowlesrice.com</p> <p>25</p> <p>17 FOR THE DEFENDANT, ALBERTSONS:</p> <p>18 GREGORY FRANKLIN, ESQ.</p> <p>19 GREENBERG TRAURIG, LLP</p> <p>20 2200 Ross Avenue</p> <p>21 Suite 5200</p> <p>22 Dallas, Texas 75201</p> <p>23 (214) 665-3641</p> <p>24 gregory.franklin@gtlaw.com</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>1 - - -</p> <p>2 I N D E X</p> <p>3 - - -</p> <p>4 EXAMINATION OF JENNIFER GILLEY PAGE</p> <p>5 BY MR. FRANKLIN..... 8</p> <p>6 BY MS. AYACHI.....107</p> <p>7 CHANGES AND SIGNATURE.....109</p> <p>8 REPORTER'S CERTIFICATION.....111</p> <p>9 * * *</p> <p>10 E X H I B I T S</p> <p>11 EXHIBITS DESCRIPTION PAGE</p> <p>12 Exhibit 1 Amended Notice of Deposition 13</p> <p>13 for The Challenge of Tarrant</p> <p>14 County</p> <p>15 Exhibit 2 Document titled "Family 49</p> <p>16 Recovery Court - Client Served</p> <p>17 by Track," CHAL0000850</p> <p>18 Exhibit 3 Letter dated January 31, 2008, 61</p> <p>19 from G.K. Maenius, CHAL0000107</p> <p>20 through 0000110</p> <p>21 Exhibit 4 Agreement, dated January 13, 63</p> <p>22 2009, CHAL0000111 through</p> <p>23 0000113</p> <p>24 Exhibit 5 Letter dated February 5, 2010, 64</p> <p>25 from G.K. Maenius, CHAL0000114</p> <p> through 0000117</p> <p>Exhibit 6 Letter dated February 1, 2011, 65</p> <p> from G.K. Maenius, CHAL0000118</p> <p> through 0000121</p> <p>Exhibit 7 Agreement dated February 14, 65</p> <p> 2012, CHAL0000122 through</p> <p> 0000124</p>
<p style="text-align: right;">Page 3</p> <p>1 APPEARANCES (CONTINUED):</p> <p>2 ALSO PRESENT:</p> <p>3 Megan King, Videographer</p> <p>4 Veritext Legal Solutions</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 5</p> <p>1 EXHIBITS (CONTINUED):</p> <p>2 Exhibit 8 Agreement dated March 19, 66</p> <p>3 2013, CHAL0000125 through</p> <p>4 0000127</p> <p>5 Exhibit 9 Contract for Services, 67</p> <p>6 CHAL0000003 through 0000008</p> <p>7</p> <p>8 Exhibit 10 Contract for Services, 74</p> <p>9 CHAL0000009 through 0000015</p> <p>10 Exhibit 11 Letter dated July 30, 2013, 78</p> <p>11 CHAL0000018 through 0000020</p> <p>12</p> <p>13 Exhibit 12 Letter dated November 12, 82</p> <p>14 2013, from Wendy Curtis,</p> <p>15 CHAL0000021 through 0000030</p> <p>16</p> <p>17 Exhibit 13 Contract for Services, 83</p> <p>18 CHAL0000031 through 0000035</p> <p>19 Exhibit 14 Letter dated July 15, 2015, 84</p> <p>20 CHAL0000036</p> <p>21</p> <p>22 Exhibit 15 Letter dated July 30, 2016, 84</p> <p>23 CHAL0000037 and 0000038</p> <p>24 Exhibit 16 Contract for Services, 86</p> <p>25 CHAL0000045 through 0000050</p> <p>Exhibit 17 Purchase Order and Contract 87</p> <p> for Services, CHAL0000051</p> <p> through 0000075</p> <p>Exhibit 18 Letter dated July 10, 2020, 88</p> <p> CHAL0000076 and 0000077</p> <p>Exhibit 19 Letter dated November 4, 2020, 89</p> <p> CHAL0000086 through 0000091</p> <p>Exhibit 20 Letter dated July 23, 2021, 90</p> <p> CHAL0000092 through 0000101</p> <p>Exhibit 21 Annual Contract for 91</p> <p> Administration of Family Drug</p> <p> Court, CHAL0000102 through</p> <p> 0000106</p>

<p style="text-align: right;">Page 6</p> <p>1 EXHIBITS CONTINUED:</p> <p>2 Exhibit 22 Budget Year June 1, 2016 - May 93 31, 2017, CHAL0001197</p> <p>3</p> <p>4 Exhibit 23 Budget Year June 1, 2016 - May 93 31, 2017, CHAL0001199</p> <p>5 Exhibit 24 Budget Year June 1, 2018 - May 93 31, 2019, CHAL0001201</p> <p>6</p> <p>7 Exhibit 25 Budget Year June 1, 2019 - May 93 31, 2020, CHAL0001204</p> <p>8 Exhibit 26 Budget Year June 1, 2020 - May 93 31, 2021, CHAL0001205</p> <p>9</p> <p>10 Exhibit 27 Budget Year June 1, 2021 - May 93 31, 2022, CHAL0001207</p> <p>11 Exhibit 28 Budget Year June 1, 2022 - May 93 31, 2023, CHAL0001209</p> <p>12</p> <p>13 Exhibit 29 Document pulled from 103 https://challengec.org/naxalone, Frequently Asked 14 Questions</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 8</p> <p>1 BY MR. FRANKLIN:</p> <p>2 Q. Give me a second, Mrs. Gilley. I'm trying to 3 work on this. Okay. Now we are ready to get started. 4 Good morning, once again. Could you please 5 state your name for the record?</p> <p>6 A. Jennifer Gilley.</p> <p>7 THE VIDEOGRAPHER: Counsel, could you put 8 your microphone on? Thank you.</p> <p>9 BY MR. FRANKLIN:</p> <p>10 Q. Mrs. Gilley, can you hear me okay?</p> <p>11 A. Yes.</p> <p>12 Q. Awesome.</p> <p>13 Mrs. Gilley, my name is Gregory Franklin, 14 and I'm an attorney here at Greenberg Traurig, and I 15 represent the Albertson defendants in this case. 16 Also in Zoom land, I have my colleague, 17 Mr. Aaron Boone, who represents Defendant Kroger's. Also 18 in Zoom we have counsel for the plaintiff, Tarrant County. 19 I just want to confirm with you this morning 20 that you and the town of Tarrant County are not being 21 represented by counsel?</p> <p>22 A. That is correct, yes, sir.</p> <p>23 Q. For the purpose of this deposition, when I use 24 the word "Defendants," I am referring to Albertsons as 25 well as Kroger's. You understand that?</p>
<p style="text-align: right;">Page 7</p> <p>1 PROCEEDINGS:</p> <p>2 (Friday, August 18, 2023, 10:05 a.m.)</p> <p>3 THE VIDEOGRAPHER: We're on the record at 4 10:05 a.m., on August 18th, 2023. This is the deposition 5 of Jennifer Gilley in the matter of, In Re: National 6 Prescription Opiate Litigation, filed in the Northern 7 District of Ohio, Eastern Division, Case No. 17-MD-2804. 8 At this time, counsel please state your 9 appearances for the record.</p> <p>10 THE COURT REPORTER: I think we're going to 11 do them stenographically.</p> <p>12 Mrs. Gilley, would you please raise your 13 right hand?</p> <p>14 THE WITNESS: (Complied.)</p> <p>15 THE COURT REPORTER: Do you solemnly swear 16 the testimony you're about to give will be the truth, the 17 whole truth, and nothing but the truth, so help you God?</p> <p>18 THE WITNESS: Yes.</p> <p>19 THE COURT REPORTER: Thank you. We may 20 proceed.</p> <p>21 JENNIFER GILLEY, 22 after having been first duly sworn by the above-mentioned 23 Certified Court Reporter, was examined and testified as 24 follows:</p> <p>25 EXAMINATION</p>	<p style="text-align: right;">Page 9</p> <p>1 A. Yes, sir.</p> <p>2 Q. And as a -- an initial matter, because you are 3 not being represented by counsel, the dynamics of the 4 deposition may be a little strange than what you're 5 accustomed to.</p> <p>6 You may hear -- either counsel may say 7 "form" or "object" to either a question I may pose to you 8 or how you respond, and that's just the way that we object 9 in depositions. But after counsel states "form" or enter 10 their objection, please feel free to respond to the 11 question.</p> <p>12 You understand that?</p> <p>13 A. No, sir. I'm so sorry.</p> <p>14 Q. Okay. Okay. You may hear the word "form" or 15 "objection" throughout this deposition, and that's just 16 the way that counsel records an objection on the record, 17 but that doesn't prohibit you from having to respond to 18 the question.</p> <p>19 You understand?</p> <p>20 A. I'm still required to respond?</p> <p>21 Q. Yes.</p> <p>22 A. (Witness nods head affirmatively.)</p> <p>23 Q. Okay. And we'll go over some -- some 24 housekeeping matters just to -- so we can have some 25 guidelines for this deposition.</p>

<p style="text-align: right;">Page 10</p> <p>1 You understand that you were sworn under</p> <p>2 oath?</p> <p>3 A. Yes, sir.</p> <p>4 Q. And that means that you are sworn to tell the</p> <p>5 truth. You understand that?</p> <p>6 A. Yes, sir.</p> <p>7 Q. And as great as our court reporter is, she cannot</p> <p>8 record gestures, head nods, and so what I'll request from</p> <p>9 you is to give oral responses to the question.</p> <p>10 A. Yes, sir.</p> <p>11 Q. And as well, we want to avoid speaking over each</p> <p>12 other. It's not only difficult for the record, but it's</p> <p>13 also difficult for the court reporter to get our exchange.</p> <p>14 And so my request, as a housekeeping matter, is: After I</p> <p>15 pose the question, then you will -- I'll give it some</p> <p>16 time, then I'll allow you to respond, to give your</p> <p>17 complete answer, and then we'll go on to the next</p> <p>18 question.</p> <p>19 A. Yes, sir.</p> <p>20 Q. Is there any reason today that you cannot give me</p> <p>21 your full attention?</p> <p>22 A. No, sir.</p> <p>23 Q. Have you taken any medications that may prohibit</p> <p>24 you from giving full answers -- full and accurate answers</p> <p>25 this morning?</p>	<p style="text-align: right;">Page 12</p> <p>1 feel free to relax. We're just going to have a</p> <p>2 conversation. The things that will be presented today</p> <p>3 are -- really will be based on the documents that you</p> <p>4 produced to us back last -- November of last year.</p> <p>5 So anything that you see today will</p> <p>6 likely -- introduced by me will not be something that you</p> <p>7 have not seen before, and the documents have also been</p> <p>8 shared with all counsel for them to review. So --</p> <p>9 A. Yes, sir.</p> <p>10 Q. So there won't be any surprises, and just please</p> <p>11 relax. I can see that you're feeling tense.</p> <p>12 And if you need to take a break, we'll do</p> <p>13 that at any point in time. Understood?</p> <p>14 A. Thank you.</p> <p>15 Q. Okay. Mrs. Gilley, are you familiar with the</p> <p>16 allegations in -- that's -- of controversy in this case?</p> <p>17 A. No, sir.</p> <p>18 Q. I sent you a notice to your e-mail, j-e-n@tc- --</p> <p>19 ttchallenge --</p> <p>20 A. -- tcchallenge.org.</p> <p>21 Q. -- .org.</p> <p>22 Did you receive that notice?</p> <p>23 A. To be here today, yes.</p> <p>24 Q. I'm going to share with you Exhibit 1, which is</p> <p>25 the Amended Notice of Deposition for The Challenge of</p>
<p style="text-align: right;">Page 11</p> <p>1 A. No, sir.</p> <p>2 Q. This -- a deposition isn't a test of endurance.</p> <p>3 As a rule of thumb, I like to have breaks after each hour</p> <p>4 to give the court reporter a break and then give the</p> <p>5 witness a break. But at any time if you need to take a</p> <p>6 break, I request that, after I ask the question, I'll ask</p> <p>7 for you to respond completely, and then once you are</p> <p>8 completed with your response, we can take the break.</p> <p>9 A. Yes, sir.</p> <p>10 Q. At any point in time that you do not understand</p> <p>11 my question, feel free to ask me to rephrase the question</p> <p>12 or to repeat the question. If you do not do so, I will</p> <p>13 presume that you understood the question and that you are</p> <p>14 answering the question according to -- to how I intended</p> <p>15 the question to go.</p> <p>16 A. Yes, sir.</p> <p>17 Q. Now, did you bring any documents with you today?</p> <p>18 A. No, sir.</p> <p>19 Q. Mrs. Gilley, have you been deposed before?</p> <p>20 A. No, sir.</p> <p>21 Q. Have you ever given testimony at trial before?</p> <p>22 A. No, sir.</p> <p>23 Q. So this is a totally new experience for you?</p> <p>24 A. It is.</p> <p>25 Q. And understanding that this is a new experience,</p>	<p style="text-align: right;">Page 13</p> <p>1 Tarrant County. Please take a look at it.</p> <p>2 A. (Witness examines document.)</p> <p>3 (Exhibit 1 was marked for identification.)</p> <p>4 BY MR. FRANKLIN:</p> <p>5 Q. Is this the notice that you received?</p> <p>6 A. Yes, sir, it is.</p> <p>7 Q. At a high level, Mrs. Gilley, the allegations</p> <p>8 that have been alleged against the defendants is that</p> <p>9 Albertsons and Kroger's are causing an opioid crises or</p> <p>10 challenge in Tarrant County.</p> <p>11 Do you have -- my first question is: Do you</p> <p>12 agree with that allegation?</p> <p>13 MS. AYACHI: Objection, form.</p> <p>14 THE WITNESS: I don't feel that I have the</p> <p>15 ability to answer that question.</p> <p>16 BY MR. FRANKLIN:</p> <p>17 Q. Other than gathering documents for this</p> <p>18 deposition, have you had any involvement in this lawsuit?</p> <p>19 A. No, sir.</p> <p>20 Q. Before today, have you spoke to any other</p> <p>21 attorney regarding this lawsuit?</p> <p>22 A. No, sir.</p> <p>23 Q. Have you reviewed any documents beyond the ones</p> <p>24 you produced to me in November of 2022?</p> <p>25 A. No, sir.</p>

<p style="text-align: right;">Page 14</p> <p>1 Q. Have you reviewed any documents related to the</p> <p>2 defendants in this case?</p> <p>3 A. No, sir.</p> <p>4 Q. Are you aware of any other depositions that have</p> <p>5 taken place in this case?</p> <p>6 A. No, sir, only that you shared with me that there</p> <p>7 were other depositions that were to take place.</p> <p>8 Q. Have you informed anyone else that you're taking</p> <p>9 a deposition in this matter?</p> <p>10 A. Yes, sir, my board of directors.</p> <p>11 Q. Please expo- -- please explain what you told</p> <p>12 them.</p> <p>13 A. That I had received a subpoena to be disposed</p> <p>14 [sic] regarding the documents that I had delivered to you</p> <p>15 last November.</p> <p>16 Q. What we're going to do right now, Mrs. Gilley, is</p> <p>17 go over your background. Are you from Texas?</p> <p>18 A. I am.</p> <p>19 Q. And did you go to high school here?</p> <p>20 A. I did.</p> <p>21 Q. Where?</p> <p>22 A. In Strawn, Texas.</p> <p>23 Q. I'm geographically challenged. Where is</p> <p>24 Strong, Texas?</p> <p>25 A. Strawn, S-T-R-A-W-N, is west of Fort Worth about</p>	<p style="text-align: right;">Page 16</p> <p>1 Q. So, Mrs. Gilley, if I follow you correctly, you</p> <p>2 started school at Tarleton in 1979, and you left Tarleton</p> <p>3 State, that'd be, '84 or '85?</p> <p>4 A. Approximately. I'm -- I'm sorry; I'm not sure of</p> <p>5 the exact date.</p> <p>6 Q. What did you get your master's in?</p> <p>7 A. Education.</p> <p>8 Q. Did you pursue any other grad- -- any other</p> <p>9 education beyond your master's at Tarleton State?</p> <p>10 A. No, sir.</p> <p>11 Q. After you left Tarleton State, were you employed</p> <p>12 by a business, company, et cetera?</p> <p>13 A. I was employed by the Catholic Diocese of Fort</p> <p>14 Worth as an educator.</p> <p>15 Q. What year did you start with the Catholic Diocese</p> <p>16 of Fort Worth?</p> <p>17 A. I'm so sorry; I don't have those dates right off</p> <p>18 the top of my head. It was upon my graduation with my</p> <p>19 undergraduate degree. So it would be relatively the time</p> <p>20 period that you previously stated.</p> <p>21 Q. Well, I want to -- to be clear, the dates that I</p> <p>22 previously stated was the time period between your</p> <p>23 beginning your undergrad through your graduate studies.</p> <p>24 But if I understand you correctly, you started working for</p> <p>25 the Catholic Diocese after undergrad?</p>
<p style="text-align: right;">Page 15</p> <p>1 65 miles.</p> <p>2 Q. What county is that in?</p> <p>3 A. Palo Pinto.</p> <p>4 Q. What was the name of your high school?</p> <p>5 A. Strawn ISD.</p> <p>6 Q. When did you graduate from Strawn ISD?</p> <p>7 A. In 1979.</p> <p>8 Q. Did you pursue higher education after you</p> <p>9 graduated from Strawn ISD?</p> <p>10 A. I did.</p> <p>11 Q. Where did you go to school?</p> <p>12 A. Tarleton State University.</p> <p>13 Q. You're a Purple People Eater.</p> <p>14 What did you study at Tarleton State?</p> <p>15 A. Science.</p> <p>16 Q. Any particular discipline within science?</p> <p>17 A. Biology.</p> <p>18 Q. What years were you at Tarleton State University?</p> <p>19 A. I was there four years, so from the time of</p> <p>20 graduation, and then I completed a master's there after</p> <p>21 graduating with my undergraduate degree.</p> <p>22 Q. How long did it take for you to get your -- your</p> <p>23 master's?</p> <p>24 A. I'm so sorry. I'd have to do the math, but I</p> <p>25 believe I worked on it for two to three years.</p>	<p style="text-align: right;">Page 17</p> <p>1 A. That is a correct statement. I was going to</p> <p>2 summer school to work on my master's.</p> <p>3 Q. Would that have been 1983, thereabout?</p> <p>4 A. Yes, sir, '83, '84.</p> <p>5 Q. What did you teach for the Catholic Diocese?</p> <p>6 A. In my first position, I was a instructor of</p> <p>7 English, and then moving to a different school, I taught</p> <p>8 science and speech.</p> <p>9 Q. Within science, did you teach biology, which was</p> <p>10 the basis of your undergrad degree?</p> <p>11 A. No -- no, sir. I instructed in the physical</p> <p>12 sciences.</p> <p>13 Q. How long did you work for the Catholic Diocese?</p> <p>14 A. In an effort not to in any way give you incorrect</p> <p>15 information -- I'm sorry. I don't have that. I would've</p> <p>16 gladly brought all of these dates with me had I known</p> <p>17 that -- that this would be asked of me.</p> <p>18 Q. Mrs. Gilley -- and I'm not asking you for the</p> <p>19 exact date. But if you can give me an estimate of the</p> <p>20 year, that will be helpful so I can understand the</p> <p>21 relative time period for your -- recollection.</p> <p>22 A. Three years as a classroom teacher, and then I</p> <p>23 moved into administration.</p> <p>24 Q. How long were you in administration?</p> <p>25 A. Mr. Franklin, I'm not sure of the exact number of</p>

<p style="text-align: right;">Page 18</p> <p>1 years. That's been quite some time ago.</p> <p>2 Q. After you left the Catholic Diocese, where were</p> <p>3 you employed?</p> <p>4 A. I was employed at AIDS Outreach Center.</p> <p>5 Q. Why did you leave the Catholic Diocese?</p> <p>6 A. I wanted a career change.</p> <p>7 Q. Do you recall what year you started at the AIDS</p> <p>8 Outreach Center?</p> <p>9 A. No, sir, I don't. But I'd be happy to provide</p> <p>10 that date to you.</p> <p>11 Q. What was your role at the AIDS Outreach Center?</p> <p>12 A. I was the coordinator of volunteer services.</p> <p>13 Q. Please explain what you did as the coordinator of</p> <p>14 volunteer services.</p> <p>15 A. The clientele of AIDS Outreach Center, our</p> <p>16 clients were individuals and families who were living with</p> <p>17 HIV and AIDS. And during that period, I was the</p> <p>18 supervisor of The Nutrition Center, The Legal Network, The</p> <p>19 Minority Outreach Program, The Buddy Program.</p> <p>20 Q. What was The Buddy Program?</p> <p>21 A. It was the program that provided community care</p> <p>22 for individuals in the community for other individuals who</p> <p>23 were living with HIV and AIDS.</p> <p>24 Q. I just want to take a quick step back. When you</p> <p>25 worked for the Catholic Diocese, where -- where were you?</p>	<p style="text-align: right;">Page 20</p> <p>1 Which name is correct?</p> <p>2 A. The registered name of the 501(c)(3) is Tarrant</p> <p>3 County Challenge, Inc. d/b/a Challenge of Tarrant County.</p> <p>4 Q. In a few minutes I want to talk more about your</p> <p>5 role as executive director and the services that the</p> <p>6 Challenge of Tarrant County provides, but I do have a few</p> <p>7 more questions regarding your background.</p> <p>8 Are you a member of any professional</p> <p>9 organizations?</p> <p>10 A. Our organization is a member of professional</p> <p>11 organizations.</p> <p>12 Q. Could you identify those professional</p> <p>13 organizations that the Challenge of Tarrant County is a</p> <p>14 member of?</p> <p>15 A. Yes, sir. We're a member of Texas Association of</p> <p>16 Substance Abuse Programs.</p> <p>17 Q. Before we move on to the next one, tell me more</p> <p>18 about that organization.</p> <p>19 A. It's a state-wide organization that's, for all</p> <p>20 practical purposes, a trade organization.</p> <p>21 Q. What makes it a trade organization?</p> <p>22 A. It's composed of members in the -- who deliver</p> <p>23 services in the field of substance abuse treatment and</p> <p>24 prevention.</p> <p>25 Q. Is this, for a lack of better words, a lobbying</p>
<p style="text-align: right;">Page 19</p> <p>1 A. Fort Worth.</p> <p>2 Q. Is the AIDS Outreach Center also located in</p> <p>3 Fort Worth?</p> <p>4 A. It is.</p> <p>5 Q. Do you currently live in Tarrant County?</p> <p>6 A. I do.</p> <p>7 Q. Did you live in any other county between the time</p> <p>8 you lived in Strawn, Texas, until whenever you were --</p> <p>9 began your career at the Catholic Diocese?</p> <p>10 A. I did not.</p> <p>11 Q. Do you recall when you left the AIDS Outreach</p> <p>12 Center?</p> <p>13 A. I was there -- I left there in, to the best of my</p> <p>14 recollection, 1998 -- wait just a moment, that is -- that</p> <p>15 would be correct, yes.</p> <p>16 Q. Why did you leave the AIDS Outreach Center?</p> <p>17 A. I, again, had the opportunity to become the</p> <p>18 executive director at Challenge, and so I interviewed for</p> <p>19 that job.</p> <p>20 Q. Okay. So you've been at Challenge of Tarrant</p> <p>21 County since 1998?</p> <p>22 A. That's correct.</p> <p>23 Q. And for clarity purposes, I've heard it called</p> <p>24 Tarrant Challenge, and I've also heard it being called the</p> <p>25 Challenge of Tarrant County.</p>	<p style="text-align: right;">Page 21</p> <p>1 organization?</p> <p>2 MS. AYACHI: Objection, form.</p> <p>3 THE WITNESS: On some occasions, the</p> <p>4 organization will engage in services -- engage in</p> <p>5 activities that do educate regarding substance use</p> <p>6 disorders. I'm not the executive director of that</p> <p>7 organization, so I can't tell you all the intricacies.</p> <p>8 BY MR. FRANKLIN:</p> <p>9 Q. You don't have to tell me verbatim. But what is</p> <p>10 the mission and purpose of the organization?</p> <p>11 A. I can look that up and tell you, but I don't have</p> <p>12 the mission of the organization memorized through its</p> <p>13 mission statement. I'm not an officer of the</p> <p>14 organization.</p> <p>15 Q. Exactly. And that's how I -- that's why I asked</p> <p>16 the question that way. You don't have to tell me the</p> <p>17 exact articulated mission. But -- well, let me ask the</p> <p>18 question a little bit differently. What is the purpose of</p> <p>19 the organization?</p> <p>20 A. I -- the organization has many purposes. It</p> <p>21 depends upon how the organization that is a member chooses</p> <p>22 to access or engage in those services. There's meetings</p> <p>23 that take place for education and collaboration.</p> <p>24 If there are particular issues that are</p> <p>25 pertinent to the field, that would be something that the</p>

<p style="text-align: right;">Page 22</p> <p>1 association would try to educate on.</p> <p>2 Q. The Texas Association of Substance Abuse</p> <p>3 Programs, based on what you just articulated is -- they</p> <p>4 provide education services. My question to you is: Do</p> <p>5 they provide education services exclusively on substance</p> <p>6 abuse disorders?</p> <p>7 A. No. They would also educate on prevention</p> <p>8 activities as well.</p> <p>9 Q. Who do they educate?</p> <p>10 A. Educate members. So if you attend meetings of</p> <p>11 the association, you could collaborate and gain education.</p> <p>12 Q. And the organization would not provide education</p> <p>13 to the general public outside of the members who</p> <p>14 participate in the organization?</p> <p>15 A. To the best of my knowledge, that would be</p> <p>16 correct, yes.</p> <p>17 Q. Do you recall what year the Challenge of Tarrant</p> <p>18 County became a member?</p> <p>19 A. I do not.</p> <p>20 Q. To your knowledge, has this organization provided</p> <p>21 education around the opioid challenges in the State of</p> <p>22 Texas?</p> <p>23 MS. AYACHI: Objection, form.</p> <p>24 THE WITNESS: I -- I do not know the</p> <p>25 answer -- I don't know the answer to that.</p>	<p style="text-align: right;">Page 24</p> <p>1 Q. Do they host education- -- educational seminars</p> <p>2 like The Association of Substance Abuse?</p> <p>3 MS. AYACHI: Objection, form.</p> <p>4 THE WITNESS: Much -- much broader, much</p> <p>5 larger, as a national organization.</p> <p>6 BY MR. FRANKLIN:</p> <p>7 Q. Do you have any knowledge of whether CADCA has</p> <p>8 hosted or presented education on the opioid epidemic in</p> <p>9 the United States?</p> <p>10 A. I do not know that.</p> <p>11 Q. What year did the Challenge of Tarrant County</p> <p>12 become a member of CADCA?</p> <p>13 A. I don't know that date off the top of my head.</p> <p>14 Q. Is it still a member of the organization?</p> <p>15 A. It is.</p> <p>16 Q. What other organization is the Challenge of</p> <p>17 Tarrant County a member of?</p> <p>18 A. Tarrant County Mental Health Connection.</p> <p>19 Q. Tell me more about Tarrant County Mental Health</p> <p>20 Connection.</p> <p>21 A. Tarrant County Mental Health Connection is a</p> <p>22 collaboration that works to increase access for mental</p> <p>23 health disorders in our community.</p> <p>24 Q. Do they have a -- strike that question.</p> <p>25 Do you know whether or not the organization</p>
<p style="text-align: right;">Page 23</p> <p>1 BY MR. FRANKLIN:</p> <p>2 Q. Where is the organization based?</p> <p>3 A. The organization's executive director, I would</p> <p>4 have to look up where she lives. I don't know. Most of</p> <p>5 the meetings take place in Austin.</p> <p>6 Q. There isn't a physical location where the Texas</p> <p>7 Association of Substance Abuse operates out of?</p> <p>8 A. I am not aware of a specific location. That</p> <p>9 doesn't mean that one doesn't exist.</p> <p>10 Q. In addition to the Texas Association of Substance</p> <p>11 Abuses -- Abuse, what other organizations the Challenge of</p> <p>12 Tarrant County is a member of?</p> <p>13 A. We're a member of the -- of CADCA, which is the</p> <p>14 Community Anti-Drug Coalition of America.</p> <p>15 Q. Tell me more about that organization.</p> <p>16 A. It's a very large national organization that</p> <p>17 is -- has many, many facets to it.</p> <p>18 Q. Well, what's the purpose of the organization?</p> <p>19 A. To assist community coalitions that are working</p> <p>20 in the prevention of substance use disorders in their</p> <p>21 community.</p> <p>22 Q. Is this a nonprofit organization?</p> <p>23 A. It is.</p> <p>24 Q. Where is it based?</p> <p>25 A. Bethesda, Maryland, I believe.</p>	<p style="text-align: right;">Page 25</p> <p>1 is involved in addressing substance abuse disorders in</p> <p>2 Tarrant County?</p> <p>3 A. Involved to what extent? I -- I'm afraid I don't</p> <p>4 understand your question.</p> <p>5 We -- the organization works to create</p> <p>6 access for a broad array of mental health services.</p> <p>7 Q. To clarify that question, does the organization</p> <p>8 specifically provide services to address substance abuse</p> <p>9 disorders in Tarrant County?</p> <p>10 A. No, sir.</p> <p>11 Q. Is it more of a -- an educational organization,</p> <p>12 or do they provide actual services addressing mental</p> <p>13 health?</p> <p>14 A. It is to create community awareness and access to</p> <p>15 services.</p> <p>16 Q. Well, when did the Challenge of Tarrant County</p> <p>17 become of a member of the Mental Health Connection?</p> <p>18 A. I apologize, I do not know that exact date.</p> <p>19 Q. Is the Challenge of Tarrant County still a member</p> <p>20 of the organization?</p> <p>21 A. It is.</p> <p>22 Q. Is the Challenge of Tarrant County a member of</p> <p>23 any other professional organization?</p> <p>24 A. No, sir, we're not.</p> <p>25 Q. Have you had any training related to</p>

<p style="text-align: right;">Page 26</p> <p>1 uncontrolled -- controlled substances?</p> <p>2 MS. AYACHI: Objection, form.</p> <p>3 THE WITNESS: Do you mean, have I</p> <p>4 participated in seminars that have educated me?</p> <p>5 BY MR. FRANKLIN:</p> <p>6 Q. Yes.</p> <p>7 A. Oh, throughout my career, yes.</p> <p>8 Q. Are there any that you can identify?</p> <p>9 A. None specifically.</p> <p>10 Q. Then, generally, what types of things have you</p> <p>11 learned from those training sessions?</p> <p>12 MS. AYACHI: Objection, form.</p> <p>13 BY MR. FRANKLIN:</p> <p>14 Q. Well, let me ask the question more specifically.</p> <p>15 When you've taken training based on controlled substances,</p> <p>16 have you learned anything regarding the dispensing of</p> <p>17 prescription opioids?</p> <p>18 MS. AYACHI: Objection, form.</p> <p>19 THE WITNESS: I have not specifically had</p> <p>20 any training around the dispensing of opioids.</p> <p>21 BY MR. FRANKLIN:</p> <p>22 Q. Have you had any training related to the</p> <p>23 prevention of -- strike that question.</p> <p>24 Have you been a part of any training that</p> <p>25 had basic concepts of how to prevent substance abuse in</p>	<p style="text-align: right;">Page 28</p> <p>1 THE WITNESS: No, sir.</p> <p>2 BY MR. FRANKLIN:</p> <p>3 Q. Do you consider yourself an expert in the area of</p> <p>4 substance abuse disorders?</p> <p>5 A. I wouldn't say that I'm an expert, no.</p> <p>6 Q. How would you define a substance abuse disorder?</p> <p>7 A. I don't believe I have a textbook definition for</p> <p>8 substance abuse disorder. I'm not a clinician.</p> <p>9 Q. But what do you believe a substance abuse</p> <p>10 disorder is?</p> <p>11 A. I believe that I would go to the textbook and try</p> <p>12 to find a definition. I don't have a definition for it.</p> <p>13 That is not within the purview of my position.</p> <p>14 Q. Do you have any expertise related to opioids?</p> <p>15 A. I don't have any expertise other than some of the</p> <p>16 prevention strategies that we have utilized in our work.</p> <p>17 Q. I'll ask this question now, but we'll get more</p> <p>18 into it as we talk about the function of the Challenge of</p> <p>19 Tarrant County.</p> <p>20 But what, specifically, has the Challenge of</p> <p>21 Tarrant County done to prevent the utilization of opioids?</p> <p>22 MS. AYACHI: Objection, form.</p> <p>23 THE WITNESS: We have provided community</p> <p>24 prescription drop boxes for people to take unused or</p> <p>25 expired prescriptions. We have educated on the use of</p>
<p style="text-align: right;">Page 27</p> <p>1 the community?</p> <p>2 A. Yes, sir.</p> <p>3 Q. Do you recall who provided that training?</p> <p>4 A. Not specifically, no, sir.</p> <p>5 Q. So in the instance that we've just mentioned, how</p> <p>6 do you engage with obtaining that training? And let me</p> <p>7 clarify here. Is it something that you see as a part of</p> <p>8 the industry, and you see that it's something of interest</p> <p>9 to you, or is it a requirement for your role as executive</p> <p>10 director of the Challenge of Tarrant County?</p> <p>11 A. It is not a requirement.</p> <p>12 MS. AYACHI: Objection, form.</p> <p>13 BY MR. FRANKLIN:</p> <p>14 Q. In other words, you take the training because</p> <p>15 it's something of interest to you?</p> <p>16 A. Only as it would affect the performance of my</p> <p>17 duties at the organization.</p> <p>18 Q. Have you received any specialized training in</p> <p>19 medicine?</p> <p>20 A. No, sir, I have not.</p> <p>21 Q. Have you received any training in pharmacy?</p> <p>22 A. No, sir, I have not.</p> <p>23 Q. Do you consider yourself an expert on drug</p> <p>24 diversion?</p> <p>25 MS. AYACHI: Objection, form.</p>	<p style="text-align: right;">Page 29</p> <p>1 naloxone in overdose situations. We've provided</p> <p>2 community -- we've brought in outside speakers and</p> <p>3 provided community symposiums. We have engaged in</p> <p>4 environmental strategies around community awareness in the</p> <p>5 prevention of overdose.</p> <p>6 Q. And when did the Challenge of Tarrant County</p> <p>7 implement the community prescription drop boxes?</p> <p>8 A. I'm not certain of the exact date.</p> <p>9 Q. Has it been within the last five years?</p> <p>10 A. To the best of my recollection, yes.</p> <p>11 Q. Has it been over five years?</p> <p>12 A. Without going back to documents, I wouldn't know</p> <p>13 the -- the exact answer to that but would be happy to</p> <p>14 provide that information.</p> <p>15 Q. Would the community prescription drop box be used</p> <p>16 for all prescriptions beyond opioid prescriptions?</p> <p>17 A. It could be, because someone can take unused</p> <p>18 prescriptions and put them into the drop box, but that is</p> <p>19 mon- -- those prescription drop boxes are in locations --</p> <p>20 the Drug Enforcement Administration is very specific about</p> <p>21 where a drop box can be located and then how those</p> <p>22 prescriptions are transferred to a safe location or</p> <p>23 destroyed.</p> <p>24 Q. Do you have any transparency on what is placed in</p> <p>25 a drop box that you've implemented?</p>

<p style="text-align: right;">Page 30</p> <p>1 A. No, sir, I don't -- I don't know what is placed 2 in those drop boxes. They're located in hospitals, 3 clinics, police departments. 4 Q. Do you have a drop box located at the Challenge 5 of Tarrant County location? 6 A. No, sir, we would not be an appropriate location. 7 We would not be allowed to have a prescription drop box. 8 Q. Was -- the extent of the implementation of the 9 drop boxes, was it just Tarrant County -- the Challenge of 10 Tarrant County providing awareness of the existence and 11 the locations of the drop boxes? 12 A. Purchase, payment for purchase, delivery, and 13 community awareness regarding the locations. 14 Q. You mentioned that you've -- the organization has 15 educated on the use of naloxone in overdose situations. 16 Did you provide that education in a seminar? 17 MS. AYACHI: Objection, form. 18 THE WITNESS: That information would be 19 provided in individual trainings for groups of 20 individuals. 21 BY MR. FRANKLIN: 22 Q. Please explain that a little bit further when you 23 say it would be provided to groups of individuals. 24 A. School resource officers, school nurses. 25 Q. Would you provide educational material, such as</p>	<p style="text-align: right;">Page 32</p> <p>1 but we did not purchase it. There have been many programs 2 through the State that have provided that historically 3 free of charge. 4 BY MR. FRANKLIN: 5 Q. When did the Challenge of Tarrant County begin 6 distributing naloxone to school districts? 7 A. Well, it was only in the last legislative session 8 where that became possible to do with school districts. 9 Q. Are you referring to the 2021 legislative session 10 or the 2023 legislative session? 11 A. I believe it was in the most recent one. 12 Q. Then if I understand correctly, the Challenge of 13 Tarrant County has only recently began to distribute 14 naloxone to Tarrant County school districts? 15 A. That is correct. 16 Q. Do you know about how many have been distributed? 17 A. No, sir, I don't. 18 Q. And you also mentioned that you-all provided -- 19 that you brought in outside speakers and provided the 20 community with symposiums regarding -- regarding opioids. 21 A. Yes, sir. I provided all of those conference 22 brochures to you in documents that were delivered to you 23 in November. 24 Q. And did you speak at any of the symposiums or 25 conferences?</p>
<p style="text-align: right;">Page 31</p> <p>1 brochures, fly- -- flyers, et cetera? 2 A. No, sir, that is not in that format. 3 Q. Then when we talk about educating the groups, 4 this would be an oral education? 5 A. That would, sir. 6 Q. Does the Challenge of Tarrant County purchase 7 naloxone -- naloxone? 8 A. The brand name is naloxone. 9 Q. Naloxone? 10 A. No, sir, we do not purchase it. 11 Q. You -- do you maintain it at the Challenge of 12 Tarrant County office? 13 A. We do not. Individuals can have naloxone. We've 14 worked to facilitate that that be provided to schools, 15 college campuses, in the event that someone would need to 16 be resuscitated utilizing that. 17 Q. But the Challenge of Tarrant County would not 18 distribute naloxone to any entities or persons? 19 A. Well, in the -- yes, if we were able to obtain it 20 and could provide it free of charge, yes. 21 Q. Has the Tarrant -- has the Challenge of Tarrant 22 County done so historically? 23 MS. AYACHI: Objection, form. 24 THE WITNESS: We have provided naloxone to 25 school districts in order for them to have it available,</p>	<p style="text-align: right;">Page 33</p> <p>1 A. Only in the capacity of welcoming our guests. 2 Q. Do you recall any specific topics that was 3 discussed at the seminars and conferences? 4 A. No, sir, I don't. 5 Q. Which years did the Challenge of Tarrant County 6 host the seminars and conferences? 7 A. I'm sorry; I don't know the exact dates. But, 8 again, the conference brochures are in the items that were 9 provided to you in November. 10 Q. Would you say that you've hosted these 11 conferences within the last five years? 12 A. Yes. 13 Q. Anything -- strike that. 14 Have you hosted any of these conferences 15 prior to 2018? 16 A. I would prefer to have the documents checked for 17 the exact dates. 18 Q. Do you recall why the organization decided it was 19 important to host these conferences? 20 MS. AYACHI: Objection, form. 21 THE WITNESS: The opioid crises has been a 22 part of the national dialogue, and as part of our mission, 23 we would work to educate the community on growing trends. 24 MR. FRANKLIN: Mrs. Gilley, we are at the 25 top of the hour. Is everybody ready for a five-minute</p>

<p style="text-align: right;">Page 34</p> <p>1 break?</p> <p>2 MS. AYACHI: Yeah, that's fine.</p> <p>3 MR. FRANKLIN: Okay. Let's do that.</p> <p>4 THE VIDEOGRAPHER: All right. We're off the</p> <p>5 record at 11:00 a.m.</p> <p>6 (Brief recess taken.)</p> <p>7 THE VIDEOGRAPHER: We're back on the record</p> <p>8 at 11:10 a.m.</p> <p>9 BY MR. FRANKLIN:</p> <p>10 Q. Now, Mrs. Gilley, you understand that you are</p> <p>11 still under oath?</p> <p>12 A. Yes, sir.</p> <p>13 Q. I may go back to your background in a little bit,</p> <p>14 but I would like to go more towards your current position</p> <p>15 at the Challenge of Tarrant County.</p> <p>16 If I understood you correctly, you started</p> <p>17 with the Challenge of Tarrant County in 1998?</p> <p>18 A. That is correct.</p> <p>19 Q. How long has the Challenge of Tarrant County been</p> <p>20 in existence?</p> <p>21 A. 1984.</p> <p>22 Q. Do you know who the prior executive director was</p> <p>23 before you filled the role?</p> <p>24 A. I do. I'm not at the moment recalling her</p> <p>25 name -- ah, Julie Stephens.</p>	<p style="text-align: right;">Page 36</p> <p>1 roles and responsibilities as the executive director, you</p> <p>2 said that you are responsible for local initiatives.</p> <p>3 Could you define to me what you are</p> <p>4 referring -- you were referring to as local initiatives?</p> <p>5 A. For example, at one time we had United Way</p> <p>6 funding to do community education in schools. That would</p> <p>7 be a local initiative. The State funds us to provide</p> <p>8 these five community coalition projects. Those are local</p> <p>9 initiatives.</p> <p>10 Q. Do all of the projects involve or have a nexus of</p> <p>11 addressing substance abuse issues?</p> <p>12 A. Yes. We have had, over the course of the last</p> <p>13 year, a funding source through the State that was funded</p> <p>14 through federal COVID relief dollars that specifically</p> <p>15 focused on community health and wellness in underserved</p> <p>16 communities disproportionately impacted by the COVID</p> <p>17 epidemic.</p> <p>18 Q. What is the mission of Tarrant Challenge?</p> <p>19 A. The mission of Challenge is to educate the</p> <p>20 community, mobilize resources, promote collaboration, all</p> <p>21 around substance use disorder prevention, intervention,</p> <p>22 and treatment services.</p> <p>23 Q. Although I know this may vary, how many people</p> <p>24 are on staff in support of Challenge?</p> <p>25 A. At this time, we have ten full-time paid staff,</p>
<p style="text-align: right;">Page 35</p> <p>1 Q. Please describe your role as the executive</p> <p>2 director for Tarrant Challenge.</p> <p>3 A. My role is the supervision of staff. I'm</p> <p>4 responsible for the budget, responsible for fundraising</p> <p>5 through grants and local initiatives. I report to the</p> <p>6 board of directors, responsible for audits, recordkeeping,</p> <p>7 responsible to funders for deliverables.</p> <p>8 Q. What type of programs and initiatives does the</p> <p>9 Challenge of Tarrant County offer?</p> <p>10 A. Challenge has five community coalition projects</p> <p>11 for the State of Texas through the Health and Human</p> <p>12 Services Commission. We have a federal drug-free</p> <p>13 community support grant. We are the administrator of the</p> <p>14 services provided for the Tarrant County Recovery Court.</p> <p>15 I don't believe I've left out anything.</p> <p>16 We -- part of the mission of the coalition is community</p> <p>17 education and awareness.</p> <p>18 Q. When you discussed your role and responsibilities</p> <p>19 as executive director, you mentioned local initiatives.</p> <p>20 Are you referring to the role as the</p> <p>21 administrator of the Court, to be a part of that, or were</p> <p>22 you referring to something different?</p> <p>23 A. Would you repeat the question, please?</p> <p>24 Q. Yes.</p> <p>25 In your earlier response regarding your</p>	<p style="text-align: right;">Page 37</p> <p>1 and that includes myself.</p> <p>2 Q. We can go one by one. But who do you have on</p> <p>3 staff at Challenge?</p> <p>4 A. Do you mean position-wise?</p> <p>5 Q. Name and position.</p> <p>6 A. We have John Haynes, who is our chief operations</p> <p>7 officer. We have the five community coalition project</p> <p>8 directors.</p> <p>9 You want me to give you the name of each</p> <p>10 one?</p> <p>11 Q. Yes, please.</p> <p>12 A. Catherine Neil, Michelle Gonzalez, Claudia</p> <p>13 Perkins, Erica Castillo, and McKenzie Martinez.</p> <p>14 The program director for our drug-free</p> <p>15 community support grant is Abby Hancock. The supervisor</p> <p>16 over our prevention services is -- am I allowed to look?</p> <p>17 It's Melissa -- I'm trying to think of Melissa's last</p> <p>18 name -- Melissa McCarthy. And the last person is</p> <p>19 Joanna Letz, who is one of the directors in our Family</p> <p>20 Recovery Court.</p> <p>21 Q. Please describe the roles of Ms. Neil,</p> <p>22 Ms. Gonzalez, Ms. Perkins, Ms. Castillo, and Ms. Martinez,</p> <p>23 as the commun- -- community coalition directors?</p> <p>24 A. They are located -- three of them are located on</p> <p>25 college campuses: UTA, TCU, and Weatherford College. The</p>

<p style="text-align: right;">Page 38</p> <p>1 other two individuals work with high school and middle 2 schools, one in the northeast quadrant and one in the 3 northwest quadrant. 4 Their role is to develop the community 5 coalitions in those particular areas and to implement 6 environmental strategies designed to reduce substance use 7 disorders, underage binge drinking, and prescription drug 8 abuse. And the parameters of those coalitions are defined 9 by the State of Texas through the Texas Health and Human 10 Services Department. 11 Q. Are their roles funded by the Texas Health and 12 Human Services Department? 13 A. Yes, sir. 14 Q. Can you give me an example of how a director 15 would implement the aforementioned environmental strategy 16 designed to reduce substance use disorders? 17 A. It might be through designing a social media 18 campaign that would be featured at sporting events. It 19 might be through engaging community members to be part of 20 one of the Drug Enforcement Administration Drug Take Back 21 events. It might be through tabling events, just 22 educating about underage drinking, binge drinking, and the 23 potential consequences. 24 Does that answer your question? 25 Q. Yes.</p>	<p style="text-align: right;">Page 40</p> <p>1 Q. It's just that they're getting paid from 2 different buckets? 3 A. They are funded through different grant sources. 4 Q. Tell me more about Ms. McCarthy's role as the 5 supervisor over prevention services. 6 A. She is the direct supervisor that works with four 7 of our community coalitions to help them implement the 8 strategies outlined in their contracts and does the 9 reporting of measures to the State and -- and assists with 10 the federal as well. 11 Q. Can you clarify what you mean by "contracts"? 12 And let me be more specific. Who are the parties to the 13 contracts in which you refer? 14 A. The State provides contracts to providers. There 15 is a competitive grant procurement process that takes 16 place every four to five years for all services in the 17 State of Texas. And during that procurement process, they 18 select organizations to provide the entire array of 19 prevention, intervention, and treatment services in the 20 State of Texas. I wouldn't be able to tell you the number 21 of organizations they contract with, but it's several, to 22 say the least. 23 That contract outlines the amount of funding 24 for the programs that we are charged with delivering. It 25 is the same with our federal contract. These are</p>
<p style="text-align: right;">Page 39</p> <p>1 Are -- are these programs designed 2 generically to address substance abuse for all drugs and 3 alcohol? 4 A. Yes. 5 MS. AYACHI: Object to form. 6 BY MR. FRANKLIN: 7 Q. You mentioned that you have a -- that 8 Abby Hancock is the program director for the drug-free 9 community support grant. 10 Who provides the drug-free community support 11 grant? 12 A. That program was initially funded by the 13 Substance Abuse and Mental Health Services Administration 14 through the federal government, but it was transferred to 15 the CDC, Center for Disease Control and Prevention, two 16 years ago. 17 Q. And what, specifically -- what services 18 specifically does Ms. Hancock provide as the drug-free 19 community support grant director? 20 A. That similar process of environmental strategies 21 and community education, and it focused specifically on 22 the City of Arlington working with the school districts. 23 Q. So Ms. Hancock's role is pretty similar to 24 Ms. Castillo and Ms. Martinez's? 25 A. Yes, sir.</p>	<p style="text-align: right;">Page 41</p> <p>1 competitive grants. 2 Q. It sounds like the Challenge of Tarrant County 3 has done well to get to the competition to receive these 4 grants. 5 MS. AYACHI: Objection, form. 6 BY MR. FRANKLIN: 7 Q. The last person you mentioned -- no. The 8 next-to-last person you mentioned -- no. The last person 9 you mentioned was Joanne Letz? 10 A. Joanna Letz, yes, sir. 11 Q. And she is the director for the recovery court? 12 A. Coordinator is her title. 13 Q. Coordinator of the recovery court? 14 A. Yes, sir. 15 Q. I know that this may vary. But how long have you 16 had a staff of ten persons? 17 A. For the last five years. 18 Q. Prior to 2018, about how many people did you have 19 on staff? 20 MS. AYACHI: Objection, form. 21 THE WITNESS: I'm trying to think of how 22 many programs we had at that time. 23 To the best of my recollection, we had 24 seven. 25 BY MR. FRANKLIN:</p>

<p style="text-align: right;">Page 42</p> <p>1 Q. Does the increase in staff reflect the increase 2 of initiatives that are executed by the Challenge? 3 MS. AYACHI: Objection, form. 4 BY MR. FRANKLIN: 5 Q. I'll ask the question a little differently. 6 A. Thank you. 7 Q. Did you increase staff because you had additional 8 initiatives that the Challenge wanted to execute? 9 A. Yes, sir. 10 MS. AYACHI: Objection, form. 11 BY MR. FRANKLIN: 12 Q. I now want to discuss the Family Recovery Court 13 program. And to your knowledge, when did the Family 14 Recovery Court program start? 15 A. I cannot tell you the exact date. 16 Q. Did the program exist prior to you starting the 17 executive director role? 18 A. No, sir. 19 Q. Was it within the last ten years? 20 A. I am not good at recalling exact dates, as I've 21 exhibited this morning, but I am happy to provide you with 22 the exact date on which the project began. 23 Q. How did the Challenge of Tarrant County get 24 involved with the Family Recovery Court? 25 A. Tarrant County has long had many diversion</p>	<p style="text-align: right;">Page 44</p> <p>1 A. It is. It is a civil court, unlike some 2 diversion courts that are criminal in nature. 3 Q. Who did you engage with within Tarrant County to 4 implement the Family Recovery Court program? 5 MS. AYACHI: Objection, form. 6 THE WITNESS: Do you mind rephrasing, 7 please? I'm not sure I understand your question. 8 BY MR. FRANKLIN: 9 Q. If I understood your testimony earlier, the 10 Challenge of Tarrant County developed this program. 11 Did you introduce this program to a 12 particular department within Tarrant County? 13 A. We did not. We were working with the judges who 14 deal with the Child Protective Services removal cases in 15 Tarrant County. 16 Q. And do you remember the judge's name? 17 A. Judge Ellen. I'm certain that the -- the last 18 name will come to me. 19 Q. That's fine. 20 And once the Family Recovery Court program 21 was implemented, did you report to Judge Ellen? 22 A. Yes. 23 Q. Although -- I know it's been several years. But 24 what other judges have you worked with since Judge Ellen? 25 A. I don't work with this program on a daily basis,</p>
<p style="text-align: right;">Page 43</p> <p>1 courts, and one of our family court judges began to 2 realize that, quite often, a parent would have a child 3 removed by Child Protective Services as a result of an 4 existing substance use disorder which made them incapable 5 of caring for that child. 6 And there was a reoccurring pattern, and we, 7 as a community, realized that the outcomes for children 8 that are placed in the foster care system are not good 9 and that if we could help parents get into treatment and 10 recovery and be able to have their children return to 11 them, that the outcomes for those children would be much 12 better than those children entering the foster care system 13 and, many times, aging out of foster care. 14 We wrote to foundations locally, met with 15 them, and secured the initial funding for the project 16 which provides case-management services and referral to 17 treatment at no cost to the parents. And then we work 18 very closely with Child Protective Services to ultimately 19 reunite those children in a safe and healthy 20 home with their parents. 21 I'm not sure I've answered your question. 22 Q. Yes. 23 Based on what you've said -- and correct me 24 if I'm wrong -- the Family Recovery Court is a 25 diversionary program?</p>	<p style="text-align: right;">Page 45</p> <p>1 and so my function is not daily interaction with the 2 Court. Those particular judges resided in the 323rd, and 3 that -- that court has since moved from the 323rd to an 4 alternate court downtown. 5 Q. Do you know the name of the court? 6 A. I don't know the number, but I can obtain that 7 information for you. 8 Q. You did discuss this briefly, but it would help 9 my understanding if you take me through the intake process 10 of someone who comes to the Family Recovery Court, from 11 the time that they were assessed and referred to your 12 program. 13 A. If -- there are different tracks within the 14 Family Recovery Court: some parents needing intensive 15 residential services, some parents needing an inter- -- 16 intermediary program perhaps with outpatient services, and 17 some just needing very minimal service. 18 In some -- in the cases of those individuals 19 the children have not been removed, if an individual is 20 referred to the Family Recovery Court, either by the 21 attorney, whoever is assigned to that individual, would 22 request an assessment, that would be provided to determine 23 if they were eligible for the program. 24 There are a lot of things that impact that. 25 I'm sure you're familiar with ASFA. It has to be possible</p>

<p style="text-align: right;">Page 46</p> <p>1 during the time period available since the case was filed. 2 There's only a certain period of time, as you know, when a 3 return can take place. If that individual were assessed 4 to be eligible for the recovery court, then they would be 5 directed to what is referred to as the OSAR, Outreach, 6 Screening, Assessment, and Referral, another organization 7 in Tarrant County funded by the State of Texas. They 8 would be assessed to determine the level of care that they 9 needed. 10 We would be working with CPS, because it's 11 very important that, while mother, father, or both, are in 12 treatment, that they're still able to have visitation with 13 their children. So we would be working on that. 14 After the individual leaves treatment, it is 15 very often that they are homeless and without housing. So 16 the case managers, who we subcontract for with another 17 organization, would be working to find them housing, 18 either at Salvation Army, Union Gospel Mission, one of the 19 recovery support housing programs in town. 20 We would be working to help them with -- 21 sometimes individuals don't have birth certificates or 22 Social Security cards, et cetera. The case managers would 23 be working on them to help them obtain whatever documents 24 they might need. We would be helping them address the 25 case-management staff through the other organization. If</p>	<p style="text-align: right;">Page 48</p> <p>1 Recovery Court. So that's -- 2 Q. Then the -- the Family Recovery Court intakes 3 persons with substance abuse issues regardless of the 4 substance that person may be addicted to? 5 A. Absolutely, yes. 6 Q. Do you have to be a Tarrant County resident to 7 qualify? 8 A. Yes, sir. 9 Q. In this program does the Challenge of Tarrant 10 County provide services or assistance to juveniles? 11 A. The -- they would not -- the only situation I can 12 imagine is if one of the children that had been removed 13 had some special -- I can't imagine what the need would 14 even be. Because we would link them with another -- if 15 they didn't have clothing or if they didn't have school 16 supplies, they would be linked with someone in our 17 community who could assist with that. If they were put in 18 a relative placement and perhaps the -- the placement 19 couldn't afford to provide that, we would link them with 20 another community resource that could provide that child 21 with whatever that particular need was. 22 If there was -- CPS, at that point, is going 23 to be really on top of if that child needed special 24 counseling or needed trauma therapy or anything of that 25 nature. CPS is responsible for the children.</p>
<p style="text-align: right;">Page 47</p> <p>1 they needed other medical services, we would be working to 2 help them enroll in Medicaid in order that they could get 3 those services. 4 They would go through whatever treatment 5 program had been deemed appropriate. Those are, again, 6 paid for by the State. As part of that procurement 7 process, we talked about Challenge doesn't do treatment, 8 but other organizations in our community do. 9 They would be meeting with their care team. 10 They would be meeting with the judge on a regular basis to 11 talk about their progress, to see if there were any 12 special needs that weren't being met and how we could work 13 as a team to meet those needs. And CPS would be a part of 14 this entire process, because the ultimate goal is that 15 these children be reunited with their parents. 16 Q. I do have some follow-up questions based on what 17 you just testified to. 18 Who performs the initial assessment to 19 determine whether someone with a substance abuse issue 20 qualifies for the Family Recovery Court? 21 A. That would most likely be Joanna. The only 22 requirement is that -- that would exclude someone from the 23 program would be certain acts of domestic violence or 24 other type of -- of violent behavior. There's no 25 financial cost to the individual for entering the Family</p>	<p style="text-align: right;">Page 49</p> <p>1 Q. We are about midway through August of 2023. 2 How many participants have come through the 3 Family Recovery Court this year? 4 A. I have no idea. I'm sorry; I don't. I'm not 5 responsible for reporting that. I would've been happy to 6 have provided that information had I known. 7 (Exhibit 2 was marked for identification.) 8 BY MR. FRANKLIN: 9 Q. At this time I'm going to share with you 10 Exhibit 2, Bates Number CHAL0000850, which appears to be 11 the Family Recovery Court, Client Served By Track. 12 This was provided in your production. I'll 13 just give you a moment to take a look at it. 14 A. (Witness examines document.) 15 Q. Do you remember? 16 A. I do. I can tell you that, at this point, the 17 numbers are higher. 18 Q. Do you have an explanation of why the numbers are 19 higher now? 20 A. No, I don't. We've just served more clients this 21 year. 22 Q. This report dates back to 2011 through 2022. 23 Did the Family Recovery Court exist prior to 24 2011? 25 A. No, sir.</p>

<p style="text-align: right;">Page 50</p> <p>1 Q. And based on this -- on Exhibit 2, there appears 2 to be a ramp-up by track. And let me clarify that. 3 The dates in which there appears to be 4 participants varied by year. Is this based on the 5 available data, or did these particular tracks only exist 6 in the years in which they have numbers? 7 A. They only existed during the years in which the 8 numbers are there. 9 Q. Did you have any input into the development of 10 the tracks identified on here: Intensive Support Track, 11 Recovery Support Track, and Early Intervention Track? 12 MS. AYACHI: Objection, form. 13 THE WITNESS: I'm sorry. I don't understand 14 your question. 15 BY MR. FRANKLIN: 16 Q. Did you help develop the Intensive Support Track 17 for the Family Recovery Court? 18 A. Tarrant County Challenge helped develop the 19 tracks for the Family Recovery Court. 20 Q. Who within the Challenge of Tarrant County would 21 have designed and developed the tracks? 22 A. It would've been myself and different staff -- 23 Q. So in 20- -- 24 A. -- in collaboration with the judge, who, of 25 course, is ultimately responsible for everything in the</p>	<p style="text-align: right;">Page 52</p> <p>1 Q. That answers the question. 2 A. Okay. 3 Q. So from 2011 to 2022, there's an increase in the 4 overall numbers of persons who have participated in the 5 Family Recovery Court. 6 Do you have an explanation of why the 7 numbers increased over that period of time? 8 A. The numbers increased as a result of having 9 additional tracks -- does that -- additional types of 10 tracks. 11 Q. Okay. So it was based on your ability to 12 accommodate more, rather than some underlying phenomenon 13 to increase the numbers across the board? 14 A. Yeah -- yes, I'm not -- I'm trying to make sure I 15 understand your question, but I'm not sure I do. I'm just 16 not -- 17 Q. Let me -- 18 A. Please don't think I'm dense. 19 Q. -- ask the question this way: So in 2022, the 20 amount of participants were 36 that came through the 21 family recovery drug court -- that number's pretty 22 accurate? 23 A. Yes. 24 Q. -- compared to 16 in 2011. 25 Was the need the same in 2011 as in 2022?</p>
<p style="text-align: right;">Page 51</p> <p>1 court. 2 Q. Then who helped you to design the intensity -- 3 Intensive Support Track in 2011? 4 A. These tracks are simply -- as I mentioned 5 earlier, our goal is certainly early intervention, because 6 we want to save children and parents the trauma of 7 separation, of removal. And so our goal is ultimately to 8 intervene as early as possible with the family so that a 9 child removal ultimately doesn't have to take place. 10 I -- I'm not sure that there's anything 11 particularly magic. If you look at recovery courts around 12 the country, you'll see similar designs. 13 Q. Well, let me ask you the question this way: 14 The -- the separation of the tracks in 2016, and again in 15 2020, was this a evolution of your understanding of the 16 needs of the participants? 17 MS. AYACHI: Objection, form. 18 THE WITNESS: No. I -- I think it was -- 19 our desire as it -- is to intervene earlier, but in this 20 case, you have to start at a level, and the individuals in 21 the intensive track were the ones most in need of those 22 services at that moment. And then when we had the ability 23 to expand to less-intensive cases, we did. I -- I 24 don't -- 25 BY MR. FRANKLIN:</p>	<p style="text-align: right;">Page 53</p> <p>1 The need for the services is what I'm referring to. 2 MS. AYACHI: Objection, form. 3 THE WITNESS: I'm not capable of answering 4 that question. 5 BY MR. FRANKLIN: 6 Q. Okay. We'll come back to that question. I'll 7 think of a better way to ask the question to where you can 8 understand it. 9 A. Okay. 10 Q. From these numbers that you see here, are you 11 able to determine how many of the participants who have 12 come through the program suffered from addiction to 13 prescription opioids? 14 MS. AYACHI: Objection, form. 15 THE WITNESS: That information would exist 16 but only through client direct report through the 17 assessment. When the -- when the initial screening is 18 done and then when the state-funded OSAR for our region 19 were to do the full assessment, they would normally, in 20 the course of that process, determine the client's drug 21 use, type, through report. 22 BY MR. FRANKLIN: 23 Q. Would -- Joanne, since she's the person who does 24 the initial assessment, would she know that answer? 25 A. No. She would ultimately know after it was --</p>

<p style="text-align: right;">Page 54</p> <p>1 the assessment was returned and the client entered the 2 program, if the client entered the program. 3 Q. The Family Recovery Court serves persons with 4 addictions to a variety of substances. 5 A. That is correct. 6 Q. So would it be a correct assumption that, if at 7 all, someone had an addiction to prescription opioids, 8 that it would be a number less than 36 for 2022? 9 MS. AYACHI: Objection, form. 10 THE WITNESS: I don't know the answer to 11 that question. It would require complete speculation on 12 my part. I don't know the drug of use by any of these 13 clients, and I would -- I wouldn't speculate. 14 BY MR. FRANKLIN: 15 Q. Has there been any indication that all of the 16 persons who come in through the Family Recovery Court have 17 come in with addictions to prescription opioids? 18 A. Not that I'm aware. 19 MS. AYACHI: Objection, form. 20 BY MR. FRANKLIN: 21 Q. And it's your testimony that no one at the 22 Challenge of Tarrant County would know that information? 23 A. Not -- it would require us to go back and pull 24 the individual assessments on each of these clients to 25 determine the report -- the self-report of that client as</p>	<p style="text-align: right;">Page 56</p> <p>1 both female, and so they would do the drug testing on the 2 ladies, and then we contract with two gentlemen who are -- 3 who do the drug testing for the gentlemen in the program. 4 Q. You subcontract out this particular part of the 5 services. Who is the subcontractor? 6 A. Lena Pope Home, Inc. 7 Q. In addition to the drug-testing services, are 8 there any other services that Lena Pope Home provides to 9 Challenge? 10 A. They provide the case-management services, and 11 the testing would just be something that the two female 12 case managers do in the course of business. 13 Q. Explain to me the duties of a case manager. 14 A. A case manager would make sure that someone is 15 making their appointments; attending their treatment 16 services; attending court, if court is part of that 17 particular obligation for the week; meeting with other 18 services that have been identified to meet the needs of 19 that client; housing; education. 20 Q. When did Challenge first engage Lena Pope to use 21 their services? 22 A. 2011. 23 Q. How much does the Challenge of Tarrant County pay 24 Lena Pope Homes [sic] for its subcontracted services? 25 A. I would have to go back to the budget for the</p>
<p style="text-align: right;">Page 55</p> <p>1 to their drug use. 2 Q. Okay. 3 MR. FRANKLIN: We are just a little bit 4 beyond the top of the hour, and I promised a lunch break. 5 And so if you-all are ready, we can go off record and take 6 a quick lunch. Does 45 minutes work for everyone? 7 THE VIDEOGRAPHER: We're off the record at 8 12:04 a.m. 9 (Brief recess taken.) 10 THE VIDEOGRAPHER: We are back on the record 11 at 12:51 p.m. 12 BY MR. FRANKLIN: 13 Q. Mrs. Gilley, you understand that you are still 14 under oath? 15 A. Yes, sir. 16 Q. Before we went on break, we were discussing the 17 Family Recovery Court, and we'll continue to discuss that 18 on the other side of lunch. 19 So is the Challenge of Tarrant County 20 responsible for drug testing for the Family Recovery 21 Court? 22 A. We are. 23 Q. Who within the Challenge of Tarrant County 24 administers the drug tests? 25 A. That is subcontracted. The case managers are</p>	<p style="text-align: right;">Page 57</p> <p>1 program to tell you that information. It's not something 2 I would retain on the top of my head. 3 Q. As an estimate, is it over \$100,000? 4 A. I'd prefer not to guess at what it is, but I'd be 5 happy to provide you the correct information. 6 Q. Who purchases the drug kits? 7 A. They are purchased through a grant that we have 8 through the Office of the Governor. It's a -- it's a -- 9 it's a grant that goes with specialty courts, if you're 10 able to get one of them. 11 Q. Have you seen one of these kits before? 12 A. I have. 13 Q. I've -- I've heard of drug-testing kits before, 14 and I know that they differ. 15 But for the drug-testing kits that Challenge 16 of Tarrant County use, does it test all controlled 17 substances? 18 A. I do not know the answer to that. I'm happy to 19 obtain that information for you. 20 Q. Does it test more than one controlled substance? 21 A. Yes. 22 Q. Do you ever send the test to any third parties, 23 such as labs, for results? 24 A. If CPS requests a hair-strand analysis, that 25 would be conducted by an outside laboratory and would be</p>

<p style="text-align: right;">Page 58</p> <p>1 paid for by Child Protective Services.</p> <p>2 Q. Are -- the drug-testing kits that the Challenge</p> <p>3 of Tarrant County primarily use, are they the urine</p> <p>4 analysis drug kits?</p> <p>5 A. Yes, sir.</p> <p>6 Q. After the drug test is performed, does the</p> <p>7 Challenge of Tarrant County receive those results?</p> <p>8 A. Yes.</p> <p>9 Q. And what do you do with the results after you</p> <p>10 receive the results?</p> <p>11 A. If the client were found to have a positive for a</p> <p>12 substance, then CPS would be notified, and the care team</p> <p>13 would work with the client to determine: Do they need a</p> <p>14 higher level of care? What could be done to help them in</p> <p>15 their recovery process? What could be done to prevent a</p> <p>16 reoccurrence?</p> <p>17 Q. So it's not like the Challenge of Tarrant County</p> <p>18 would abandon that participant; it would just transition</p> <p>19 or find additional care to adjust the need?</p> <p>20 A. Yes. The judge would also be notified, of</p> <p>21 course, but we would indeed work to determine what could</p> <p>22 be done to more effectively assist that client in their</p> <p>23 recovery.</p> <p>24 Q. Does the Challenge of Tarrant County maintain and</p> <p>25 archive the test results?</p>	<p style="text-align: right;">Page 60</p> <p>1 here in Dallas, which has a -- a component for women.</p> <p>2 Q. But, again, those services would be pro- -- would</p> <p>3 be funded by the State?</p> <p>4 A. Yes, sir.</p> <p>5 Q. What other services does the Challenge of Tarrant</p> <p>6 County provide Tarrant County in addition to the</p> <p>7 administration of a Family Recovery Court?</p> <p>8 A. I'm not sure I understand your question. All of</p> <p>9 the programs I outlined for you this morning take place in</p> <p>10 Tarrant County.</p> <p>11 Q. Okay. Well, let me ask the question a little</p> <p>12 differently with context.</p> <p>13 You mentioned that you pro- -- the Challenge</p> <p>14 of Tarrant County provides educational services, as well</p> <p>15 as administer the Family Recovery Court?</p> <p>16 A. (No response.)</p> <p>17 Q. When you provide the education services, is that</p> <p>18 under the Family Recovery Court, or is that something</p> <p>19 different?</p> <p>20 A. It's through our state contracts with the</p> <p>21 Department of State Health Services --</p> <p>22 Q. Okay.</p> <p>23 A. -- as well as through the DFC grant that I</p> <p>24 described this morning.</p> <p>25 Q. Okay. So the only service that you really</p>
<p style="text-align: right;">Page 59</p> <p>1 A. It would -- it would be a part of the CPS record.</p> <p>2 Q. Would the Challenge of Tarrant County have access</p> <p>3 to those records?</p> <p>4 A. I do not know the answer to that, but I'm happy</p> <p>5 to get that information and provide it to you.</p> <p>6 Q. In addition to Lena Pope Homes, does the</p> <p>7 Challenge of Tarrant County receive services from other</p> <p>8 subcontractors?</p> <p>9 A. No, sir, not other than the two individual male</p> <p>10 drug testers that I identified earlier.</p> <p>11 Q. We talked a little bit earlier -- or you</p> <p>12 testified a little bit earlier about the Intensive</p> <p>13 Recovery Track --</p> <p>14 A. Yes, sir.</p> <p>15 Q. -- and that there is a residential component to</p> <p>16 it?</p> <p>17 A. Yes, sir.</p> <p>18 Q. Who provides the residential care for the</p> <p>19 participants?</p> <p>20 A. We -- the primary provider for residential</p> <p>21 services in Tarrant County that's funded by the State is</p> <p>22 our local mental health authority, MHMR of Tarrant County.</p> <p>23 It is not -- because clients can receive residential</p> <p>24 services anywhere in the State, it wouldn't -- there have</p> <p>25 been occasions where we have used Nexus Recovery Center</p>	<p style="text-align: right;">Page 61</p> <p>1 provide to Tarrant County as a entity is the</p> <p>2 administration of the Family Recovery Court?</p> <p>3 A. That is correct.</p> <p>4 MS. AYACHI: Objection, form.</p> <p>5 BY MR. FRANKLIN:</p> <p>6 Q. I'd like to spend some time going over the</p> <p>7 documents that you produced, and many of the documents</p> <p>8 were contracts. So I'd ask for you to be patient with me</p> <p>9 as we go through it, because I know there were several.</p> <p>10 (Exhibit 3 was marked for identification.)</p> <p>11 BY MR. FRANKLIN:</p> <p>12 Q. I'm going to share with you Exhibit 3, Bates</p> <p>13 number ending in 107, ending in -- the final page ending</p> <p>14 in 110.</p> <p>15 Again, Mrs. Gilley, this is --</p> <p>16 A. This is a -- this is what is referred to as a</p> <p>17 public assistance contract, and what this is for is</p> <p>18 generalized community planning, needs assessments,</p> <p>19 generalized community education, but it's a small -- it is</p> <p>20 just a very small portion of our budget. This is a --</p> <p>21 but, yes, that's exactly what this is.</p> <p>22 Q. On page 3 with Bates number ending in 110, is</p> <p>23 that your signature as the Officer and Authorized Agent?</p> <p>24 A. It is indeed.</p> <p>25 Q. And to summarize the content, if I understand</p>

<p style="text-align: right;">Page 62</p> <p>1 what you're explaining correctly, this contract for 2 \$30,000 is for, essentially, consulting services? 3 A. No. 4 Q. Okay. 5 MS. AYACHI: Objection, form. 6 BY MR. FRANKLIN: 7 Q. What is it -- please explain what -- the services 8 that are contracted under this agreement. 9 A. This agreement is for us to do community 10 education, planning, looking at what the overall needs in 11 a given area might be. We've done large community needs 12 assessments before, which would have certainly been 13 included in the documents that I provided you. But if you 14 look at our overall budget -- well, you have my overall 15 budget. 16 Q. And we'll get into that a little later. 17 Was this the first contract of its kind back 18 in 2008? 19 A. No. That was within the parameters of the 20 subpoena that you sent to me, the time frame that you had 21 within it in terms of the documents that I was to provide 22 you. 23 Q. Who is G.K. Maenius? 24 A. That is the county administrator. 25 Q. And he is the person that you engage for</p>	<p style="text-align: right;">Page 64</p> <p>1 September 30th, 2009. I'm pointing your attention to the 2 bottom of the page, Section 2, last paragraph. 3 A. Yes. 4 Q. So my question was: It was for the year -- for 5 the entire year, September the 1st, 2008, through 6 September the 30th, 2009? 7 A. It is. 8 Q. And the amount increased from 30,000 to 50,000? 9 A. Yes. 10 Q. And it's pointing your attention to the last 11 page, 113. Can you confirm that that is your signature? 12 A. Yes. 13 Q. You can set that one to the side -- Exhibit 4 to 14 the side. 15 (Exhibit 5 was marked for identification.) 16 BY MR. FRANKLIN: 17 Q. And now I will show you Exhibit 5, Bates Number 18 CHAL0000114 ending in -- Bates number ending in 117. 19 Again, you can take a look at it, if it -- if you need to 20 refresh your memory. 21 Are these for the same services that were 22 identified in Exhibit 4? 23 A. Yes. 24 Q. And, again, confirming on the last page of the 25 exhibit that this is your signature?</p>
<p style="text-align: right;">Page 63</p> <p>1 executing the contracts; is that a correct statement? 2 A. Well, I believe he prepares all -- I mean, he's 3 the county administrator. I don't know all that 4 Mr. Maenius does, but I'm guessing that preparations of 5 contracts fall under the purview of his department. 6 Q. To the extent that you know, it was his 7 department that created this contract? 8 A. I don't know that. 9 MS. AYACHI: Objection, form. 10 (Exhibit 4 was marked for identification.) 11 BY MR. FRANKLIN: 12 Q. Okay. Now, I'm going to share with you Exhibit 13 No. 4, Bates Number CHAL0000111 through Bates number 14 ending in 113. 15 You can take a second to look at it, if 16 needed. 17 A. No, it's -- it's the same as I described before. 18 Q. It's the same contract just extended from 2008 to 19 2009? 20 A. No. It is an annual sum of money that's given, 21 an annual contract. It is not a -- are you -- I'm not 22 understanding your question. 23 Q. Yeah. So here, if I'm interpreting this 24 correctly, on the first page of the exhibit, it's for 25 services rendered beginning October the 1st, 2008, through</p>	<p style="text-align: right;">Page 65</p> <p>1 A. It is. 2 (Exhibit 6 was marked for identification.) 3 BY MR. FRANKLIN: 4 Q. Now showing you Exhibit 6, Bates Number 5 CHAL0000118, ending in -- the final page of the exhibit -- 6 Bates number ending in 121. 7 You may take a look at it. 8 A. (Witness examines document.) 9 Q. Is this the same basic contract as what was 10 identified in both Exhibits 4 and 5, outside of -- the 11 operative dates for the year for services rendered October 12 the 1st, 2010, through September 30th, 2011? 13 A. Yes. 14 MS. AYACHI: Objection, form. 15 BY MR. FRANKLIN: 16 Q. Then please confirm that on the final page of 17 this exhibit, Bates number ending in 121, that that's your 18 signature under Officer and Authorized Agent. 19 A. It is. 20 (Exhibit 7 was marked for identification.) 21 BY MR. FRANKLIN: 22 Q. I'll share with you now Exhibit 7, Bates 23 CHAL0000122; the last page of exhibit -- Bates number 24 ending in 124. 25 Is this your signature on Bates number</p>

<p style="text-align: right;">Page 66</p> <p>1 ending in 124 under -- above Officer and Authorized Agent?</p> <p>2 A. It is.</p> <p>3 Q. Is this agreement consistent with what was</p> <p>4 introduced as Exhibits 4, 5, and 6?</p> <p>5 A. It is.</p> <p>6 Q. Okay. Now I'll share with you Plaintiff's</p> <p>7 Exhibit 8 -- not Plaintiff's Exhibit, just Exhibit 8 -- my</p> <p>8 apologies --</p> <p>9 (Exhibit 8 was marked for identification.)</p> <p>10 BY MR. FRANKLIN:</p> <p>11 Q. -- with Bates number ending in CHAL0000125</p> <p>12 terminating with Bates Number 127.</p> <p>13 Now, this appears to be a similar agreement.</p> <p>14 But could you confirm that this agreement is consistent to</p> <p>15 the agreements that were introduced as Exhibits 4, 5, 6,</p> <p>16 and 7?</p> <p>17 MS. AYACHI: Objection, form.</p> <p>18 THE WITNESS: (Witness examines document.)</p> <p>19 It is.</p> <p>20 BY MR. FRANKLIN:</p> <p>21 Q. Were there any additional services provided in</p> <p>22 this agreement that were not provided in the agreements</p> <p>23 identified in Exhibits 4, 5, 6, or 7?</p> <p>24 A. No.</p> <p>25 Q. And can you confirm that it's your signature on</p>	<p style="text-align: right;">Page 68</p> <p>1 Q. I'll give you a moment to get there.</p> <p>2 A. It is my signature.</p> <p>3 Q. Okay. Here under the Scope of Services appear to</p> <p>4 be different than what was mentioned in the prior</p> <p>5 exhibits, Exhibits 4 through 8. I want to step through</p> <p>6 the Contract for Services so you can explain to me what</p> <p>7 the service entails, and we can start from Section 1 --</p> <p>8 1.2.</p> <p>9 It says: The provider will provide a</p> <p>10 full-time FDC supervisor to perform all duties outlined in</p> <p>11 the roles and responsibilities in Section 4 -- or</p> <p>12 Section 6 of Attachment A.</p> <p>13 At this time, who was the full-time FDC</p> <p>14 supervisor?</p> <p>15 A. I would have to go back to my records to tell you</p> <p>16 that.</p> <p>17 Q. Well, what would be the duties performed by an</p> <p>18 FDC supervisor?</p> <p>19 MS. AYACHI: Objection, form.</p> <p>20 THE WITNESS: Among those duties would be</p> <p>21 meeting with the team that's working with the client,</p> <p>22 working with the case managers, being present at</p> <p>23 supervision hearings with the judge, communicating with</p> <p>24 Child Protective Services --</p> <p>25 BY MR. FRANKLIN:</p>
<p style="text-align: right;">Page 67</p> <p>1 the final page of the exhibit, Bates number ending in 127,</p> <p>2 as the authorized agent?</p> <p>3 A. It is.</p> <p>4 Q. And this agreement covers the period from October</p> <p>5 the 1st, 2012, through September 30th, 2013; is that</p> <p>6 correct?</p> <p>7 A. It is.</p> <p>8 Q. I'll share with you now Exhibit 9, Bates Number</p> <p>9 CHAL0000003. Exhibit concluding with Bates number ending</p> <p>10 in 007.</p> <p>11 (Exhibit 9 was marked for identification.)</p> <p>12 BY MR. FRANKLIN:</p> <p>13 Q. I want to take a few minutes to discuss what</p> <p>14 appears to be another Contract for Services.</p> <p>15 A. This is -- this is the Family Recovery Court.</p> <p>16 Q. Okay.</p> <p>17 A. At that time, it was referred to as the Family</p> <p>18 Drug Court.</p> <p>19 Q. And 2011 was the first year that the Challenge of</p> <p>20 Tarrant County provided service to Tarrant County for the</p> <p>21 Family Recovery Court; is that accurate?</p> <p>22 A. Yes, it is.</p> <p>23 Q. Can you confirm that this is your signature on</p> <p>24 page 5 with Bates number ending in 007?</p> <p>25 A. (Witness examines document.)</p>	<p style="text-align: right;">Page 69</p> <p>1 Q. When you --</p> <p>2 A. -- providing case notes.</p> <p>3 Q. When you said "meeting with the team," are you</p> <p>4 referring to only the case managers, the judge, and the</p> <p>5 CPS representative?</p> <p>6 A. The team, usually for an intensive client, would</p> <p>7 consist of those individuals, and it would not be unusual</p> <p>8 to have a CASA worker as well.</p> <p>9 Q. And CASA is an acronym for which organization?</p> <p>10 A. Child Advocates -- they're appointed by the</p> <p>11 Court. They're a national --</p> <p>12 Q. Understood. I know many people are familiar with</p> <p>13 CASA as CASA, but just for the record --</p> <p>14 A. Yes. I'm sorry. I don't know the --</p> <p>15 Q. And that's fine.</p> <p>16 A. -- Child Advocate Service...</p> <p>17 I'm sorry.</p> <p>18 Q. At this time, who funded the salary for the</p> <p>19 full-time FDC supervisor?</p> <p>20 A. A portion of it would have been funded through</p> <p>21 this contract.</p> <p>22 Q. Who would have funded the other portion?</p> <p>23 A. It -- I would have to go back and check</p> <p>24 specifically, but it could have been another funding</p> <p>25 source. It could have been a -- a grant from another</p>

<p style="text-align: right;">Page 70</p> <p>1 source. It could have been a governor's office funding a 2 small portion. It could have been a CJD. I don't -- I 3 don't recall, but it would have funded a portion of -- 4 would have been funded from this contract. 5 Q. If I interpret this contract correctly, it began 6 in 2011. Would the funding proportions be the same today 7 as it was in 2011 with a half portion through the contract 8 and another portion funded through another source? 9 MS. AYACHI: Objection, form. 10 THE WITNESS: I do not know the answer to 11 that without checking the specific budget figures. 12 BY MR. FRANKLIN: 13 Q. I want to quickly point your attention to the 14 second page of the exhibit, Bates ending in 004. 15 Under Section 2 for the term, it says: This 16 contract begins in May -- on May 10th, 2011. It concludes 17 on September 30th, 2011. 18 Is that a Scrivener error, or did this 19 contract only last through the summer of 2011? 20 MS. AYACHI: Objection, form. 21 THE WITNESS: We'd have to go back and check 22 as to why that date has that start -- why this contract 23 has that start date. 24 BY MR. FRANKLIN: 25 Q. But if I interpret this Section 2 correctly, the</p>	<p style="text-align: right;">Page 72</p> <p>1 BY MR. FRANKLIN: 2 Q. Can you explain to me, in better detail, of what 3 the provision of 1.4 is requiring the Challenge of Tarrant 4 County to execute? 5 A. It's stating that we would construct and execute 6 the contract with Lena Pope, and that if there were any 7 other grants that were received from the Substance Abuse 8 and Mental Health Services Administration or from some 9 other funding entity, that we would provide the oversight 10 for those if we received those grants. 11 Q. Moving to Section 1.5, it states: The provider 12 will provide grant writing and fund development for the 13 continuation and expansion of FDC. 14 Who -- as a part of this contract, which 15 entities did -- or does the Challenge of Tarrant County 16 solicit for grants and additional funding in support of 17 the federal -- of the Family Drug Court? 18 MS. AYACHI: Objection, form. 19 THE WITNESS: We have, in the past, made 20 grant requests to various organizations, federal and 21 state. 22 BY MR. FRANKLIN: 23 Q. Can you identify any of those? 24 A. We've written SAMHSA grants; we've worked 25 collaboratively on OJJDP grants; we've -- there's any</p>
<p style="text-align: right;">Page 71</p> <p>1 contract came with three renewal -- renewal options for an 2 additional 12 months -- for an additional 12-month period 3 each? 4 A. That's correct. 5 Q. And, generally, these contracts are for a year? 6 A. That is correct, with options of renewal. 7 Q. I want to point your attention back to the first 8 page of Exhibit 9, Section 1.3. Here it says: The 9 provider will provide one full-time intensive case manager 10 and one part-time existing intensive case manager 11 position. 12 Here, is this referring to the resources 13 that you use at -- use from Lena Pope Home? 14 A. That is correct. 15 Q. You've already identified earlier what services 16 that they provide, so we won't go back through that here. 17 On Section 1.4, it says: The provider will 18 provide fiscal administration of all funds utilized in the 19 operation of FDC, including fiscal oversight of all 20 contracts with subcontractors. 21 Is it the Challenge of Tarrant County that 22 establishes the budget for the Family Recovery Court? 23 MS. AYACHI: Objection, form. 24 THE WITNESS: The Family Recovery Court 25 budget is a part of our overall agency budget.</p>	<p style="text-align: right;">Page 73</p> <p>1 number of sources. Those are two that come to mind 2 readily. 3 Q. Who on your staff would be responsible for 4 drafting the -- the grant proposals or the -- or 5 performing the fund development? 6 A. Well, I would have a -- the major role in that. 7 Q. Anyone else from your team? 8 A. Our chief operations officer would have some hand 9 in that as well. 10 Q. You identified John Haynes -- 11 A. That's correct. 12 Q. -- as your -- the chief operation officer? 13 Was he the chief operation officer at the 14 time this contract was executed? 15 A. He was. 16 Q. Moving on to Section 1.6, it says: The provider 17 will collect, maintain, and store drug-testing samples 18 from all program participants? 19 A. I think that should be -- well, that's saying 20 that we're going to provide the oversight. We wouldn't be 21 storing samples. We -- we might be storing the supplies, 22 but we wouldn't be storing samples of anything. 23 Q. I'm moving to the next pages, Bates ending in 24 004, Section 1.7 of the contract: The provider will 25 provide monthly and annual statistical collection and</p>

<p style="text-align: right;">Page 74</p> <p>1 program evaluation including outcomes in evaluations of 2 associated services. 3 What type of deliverables specifically do 4 you provide Tarrant County in support or -- in support of 5 Section 1.7? 6 A. Well, the -- the two items that are referred to 7 there would most likely be: How many clients were served, 8 how many family members were served, how many children 9 were in the program, the clients that successfully 10 completed the program, the number of reunifications that 11 took place. 12 Q. The information that you just mentioned, these 13 reports, would you provide those to the judge of the 14 court, or is there someone else within Tarrant County you 15 would provide this information to? 16 A. We would provide it to the judge; we would 17 provide it to any funder of -- that was giving serv- -- 18 that was giving funds to the Family Recovery Court. But 19 it's -- if we made a request to United Way for something, 20 we would include such data to show the success of the 21 program. 22 Q. Now, I would like to direct -- or share with you 23 Exhibit 10, Bates Number CHAL0000009 and concluding with 24 Bates terminating in 015. 25 (Exhibit 10 was marked for identification.)</p>	<p style="text-align: right;">Page 76</p> <p>1 find the services provided by the case managers? 2 A. The services provided by the case managers would 3 be delineated in the contract to Lena Pope. 4 Q. Is that here in this particular contract on -- 5 A. No, sir. That would be a contract from Challenge 6 of Tarrant County. 7 Q. I want to make sure I understand you. So the 8 case managers' services would not be included in the 9 contract identified in Exhibit 10? 10 A. The case managers -- according to this particular 11 contract, case management was not paid out of this 12 contract. It is -- only the 1.1 through 1.6 would have 13 been services provided out of this contract. 14 Q. The 1.3, the Consultation to Judges, is the same 15 as it was in the contract in Exhibit 9? 16 A. Yes, sir. 17 Q. 1.4, Grant Writing, is that the same as well? 18 A. Yes, sir. 19 Q. 1.5, Drug Testing, is that the same? 20 A. Yes, sir. 21 Q. And 1.6, the Evaluation Reporting to Funders, is 22 the same? 23 A. Yes, sir. 24 Q. And this contract ran from September the 1st, 25 2012, through August 31st, 2013?</p>
<p style="text-align: right;">Page 75</p> <p>1 BY MR. FRANKLIN: 2 Q. And this appears to be another Contract for 3 Services. Does this contract differ to the -- to the one 4 we just talked about, Exhibit 9? 5 A. Yes, it does. 6 Q. How does it differ? 7 A. It differs by the funding source utilized in 8 payment. 9 Q. Who was the funding source in Exhibit 10? 10 A. This is -- I don't know. It is -- it is for the 11 same program. It is -- it looks to have come out of a 12 different funding source. 13 Q. Were the services provided the same under this 14 contract as in Exhibit 9? 15 A. I believe that if you look at No. 1, the scope of 16 services are listed. 17 Q. Yes. And it doesn't have the same amount of 18 detail as the prior contract, but we can go through it 19 just to be sure. 20 Under Section 1.2: Supervision of Family 21 Drug Court supervisor -- in this contract, would the 22 services rendered by the Family Drug Court supervisor be 23 the same as what was identified in Exhibit 9? 24 A. Yes. 25 Q. Where within the scope of services could I -- I</p>	<p style="text-align: right;">Page 77</p> <p>1 A. Yes, sir. 2 Q. I want to point your attention to page 5 of the 3 exhibit, Bates number ending in 013, Section 24. 4 A. Would you please say that again? 5 Q. Page 5. 6 A. Thank you. 7 Q. I want to point your -- direct your attention to 8 Section 24. 24.1, it says: The provider is hereby 9 notified that state funds may be used in whole or in part 10 to pay for services provided under terms of this contract 11 and are subject to termination without penalty -- without 12 penalty, either in whole or in part, if funds are not 13 available or not appropriated by the Texas legislature. 14 Having read that, does that refresh your 15 memory on where these funds may have come from in support 16 of the contract? 17 A. I believe that this must have been an Office of 18 the Governor's grant. 19 Q. I'd like to point your attention to page 7, Bates 20 number ending in 015. 21 Can you confirm that it's your signature 22 under the Tarrant County Challenge, Inc.? 23 A. It is. 24 Q. Okay. And the total amount paid under this 25 contract to Tarrant County Challenge was \$10,261?</p>

<p style="text-align: right;">Page 78</p> <p>1 A. It was.</p> <p>2 Q. You may place that exhibit to the side.</p> <p>3 A. (Complied.)</p> <p>4 (Exhibit 11 was marked for identification.)</p> <p>5 BY MR. FRANKLIN:</p> <p>6 Q. Sharing with you Exhibit 11, Bates ending in --</p> <p>7 well, Bates CHAL0000018, and the exhibit concludes in</p> <p>8 Bates number ending in 028.</p> <p>9 I can't recall exactly which exhibit it was,</p> <p>10 but we talked about the -- the options to renew the</p> <p>11 contract for the administration of the Tarrant County</p> <p>12 Family Drug Court.</p> <p>13 Is Exhibit 11 an example of that renewal?</p> <p>14 MS. AYACHI: Objection, form.</p> <p>15 THE WITNESS: (Witness examines document.)</p> <p>16 It is -- the -- page 1 is a copy of our</p> <p>17 willingness to continue. Are we looking at the same page?</p> <p>18 BY MR. FRANKLIN:</p> <p>19 Q. Yes, we are.</p> <p>20 In terms of the renewal process, Tarrant</p> <p>21 County will send you the renewal option, and you would</p> <p>22 execute it, identifying yes or no, whether you want to</p> <p>23 move forward for -- for the remainder of the renewal</p> <p>24 period?</p> <p>25 A. Yes, annually.</p>	<p style="text-align: right;">Page 80</p> <p>1 BY MR. FRANKLIN:</p> <p>2 Q. Okay. I understand.</p> <p>3 And also on the same page, it indicates that</p> <p>4 the contract value is \$177,768; is that correct?</p> <p>5 A. Yes, sir.</p> <p>6 Q. And these are funds that are paid directly from</p> <p>7 Tarrant County to the Challenge of Tarrant County?</p> <p>8 A. That is correct.</p> <p>9 Q. Do you have any knowledge of whether the money</p> <p>10 that was paid to the Challenge of Tarrant County pursuant</p> <p>11 to this agreement came from a -- a grant by the State of</p> <p>12 Texas or a federal grant?</p> <p>13 A. It would be impossible --</p> <p>14 MS. AYACHI: Objection, form.</p> <p>15 THE WITNESS: -- for me to answer that.</p> <p>16 BY MR. FRANKLIN:</p> <p>17 Q. Okay. Mrs. Gilley, I need your assistance to</p> <p>18 help me understand. As a part of this exhibit on Bates</p> <p>19 number ending in 022, this appears to be similar to the</p> <p>20 contract that was identified in Exhibit 10; is that</p> <p>21 accurate?</p> <p>22 A. Will you please restate your question?</p> <p>23 MS. AYACHI: Counsel, is this a new exhibit?</p> <p>24 MR. FRANKLIN: It's all a part of the same</p> <p>25 exhibit. It's -- I believe so.</p>
<p style="text-align: right;">Page 79</p> <p>1 Q. Okay. So you would execute this on an annual</p> <p>2 basis during the renewal period?</p> <p>3 A. That is correct.</p> <p>4 Q. And this is your signature on the first page of</p> <p>5 Exhibit 11?</p> <p>6 A. It is.</p> <p>7 Q. I want to direct your attention to the second</p> <p>8 page of the exhibit, Bates number ending in 020, which</p> <p>9 purports to be a purchase order. I do have a couple</p> <p>10 questions about this exhibit, Mrs. Gilley.</p> <p>11 If you look to the middle of the page, it</p> <p>12 says: Please deliver to Juvenile Services, Juvenile</p> <p>13 Justice Center. Do you see that?</p> <p>14 A. I do.</p> <p>15 Q. Do you know why this purchase order would be</p> <p>16 delivered to Juvenile Services?</p> <p>17 A. It would be delivered there, because at this</p> <p>18 time, the 323rd court was housed at Kimbo Road, which is</p> <p>19 also the Office of Juvenile Services.</p> <p>20 Q. Okay. So it's just Juvenile Services in name,</p> <p>21 but the actual court itself supported adults?</p> <p>22 A. In --</p> <p>23 MS. AYACHI: Objection, form.</p> <p>24 THE WITNESS: In this case, the Court dealt</p> <p>25 with all Child Protective Services' cases at that time.</p>	<p style="text-align: right;">Page 81</p> <p>1 MS. AYACHI: I've seen it as separate ones.</p> <p>2 MR. FRANKLIN: So the exhibit that I'm</p> <p>3 referring to is from -- starts with Bates number ending 18</p> <p>4 and concluding in 30.</p> <p>5 MS. AYACHI: I have -- I'm sorry to</p> <p>6 interrupt you. I have exhibits -- I have a document</p> <p>7 ending in 21 as a separate document from the one beginning</p> <p>8 with 18.</p> <p>9 MR. FRANKLIN: Okay. Let's correct that.</p> <p>10 BY MR. FRANKLIN:</p> <p>11 Q. What -- your Exhibit 11 ends in what number?</p> <p>12 A. 30.</p> <p>13 MS. AYACHI: Let's see. So you said</p> <p>14 Exhibit 11 ends in 18, correct? That's what I have.</p> <p>15 MR. FRANKLIN: It starts at 18 and ends</p> <p>16 in -- so what you may need to do -- can we go off record</p> <p>17 for a second?</p> <p>18 THE VIDEOGRAPHER: We're off the record at</p> <p>19 1:53 p.m.</p> <p>20 (Brief recess taken.)</p> <p>21 THE VIDEOGRAPHER: We -- we are back on the</p> <p>22 record at 2:00 p.m.</p> <p>23 BY MR. FRANKLIN:</p> <p>24 Q. All right. I want to make a change to the</p> <p>25 record. Exhibit 11 begins with Bates CHAL0000018, and it</p>

<p style="text-align: right;">Page 82</p> <p>1 concludes with Bates number ending in 020. 2 (Exhibit 12 was marked for identification.) 3 BY MR. FRANKLIN: 4 Q. Exhibit 12 will be Bates beginning with 5 CHAL0000021 and concluding with Bates number that 6 terminates in 028. Now, before that short break -- my 7 apologies -- that ends in CHAL0000030. 8 And before the break, we were just going 9 over the contracts that the Challenge of Tarrant County 10 has engaged with Tarrant County. Now, looking at 11 Exhibit 12, the first page is a letter from Ms. Curtis, 12 Wendy Curtis, to -- to Mrs. Gilley, and this appears to be 13 another executed contract for the Family Drug Court. 14 Mrs. Gilley, starting with Bates number that 15 ends in 22, on the second page, is this similar to the 16 contract that we discussed in Exhibit 9? 17 MS. AYACHI: Objection, form. 18 THE WITNESS: It looks to me to be similar 19 to Exhibit 10. 20 BY MR. FRANKLIN: 21 Q. Okay. So this is the contract that is funded by 22 a different source than the contracts that we mentioned 23 before? 24 MS. AYACHI: Objection, form. 25 BY MR. FRANKLIN:</p>	<p style="text-align: right;">Page 84</p> <p>1 A. Yes, it was. 2 Q. You may put Exhibit 13 to the side. 3 A. (Complied.) 4 (Exhibit 14 was marked for identification.) 5 BY MR. FRANKLIN: 6 Q. Now, I will show you Exhibit 14, with Bates 7 number beginning with CHAL0000036. 8 Can you explain to me what this exhibit is? 9 A. This is from the County asking if we wished to 10 continue the contract. 11 Q. For which period -- or for which date range, to 12 be more specific? 13 A. It is referencing a contract that was initially 14 issued on October 1, 2014, through September 30th of 2015, 15 and asking for -- if we wished to renew the contract for 16 the period October 1 of 2015 through September the 30th -- 17 excuse me -- October 1, 2015, through September the 30th 18 of 2016. 19 Q. Is that your signature -- 20 A. It is. 21 Q. -- on the front page? 22 (Exhibit 15 was marked for identification.) 23 BY MR. FRANKLIN: 24 Q. Now I'm sharing with you Exhibit 15, with Bates 25 Number CHAL0000037, and concluding with Bates number</p>
<p style="text-align: right;">Page 83</p> <p>1 Q. Is -- is this the contract that you mentioned 2 that may be funded by the Office of the Governor? 3 A. It is possible. I do not know. 4 Q. Okay. Can you confirm that it's your signature 5 on page 7 of 7, Bates ending in 028? 6 A. Yes, it is. 7 (Exhibit 13 was marked for identification.) 8 BY MR. FRANKLIN: 9 Q. Now, let's move to Exhibit 13, Bates -- Bates 10 beginning in CHAL0000031 and concluding in Bates that 11 terminates in 035. 12 Mrs. Gilley, can you confirm that this is 13 your signature on page 5 of 5, Bates number terminating in 14 035? 15 A. Yes, it is. 16 Q. And for the record, can you tell me what this 17 contract is for? 18 A. It is for the services delineated under 1, Scope 19 of Services, 1.1 through 1.11, with Tarrant County for the 20 Family Drug Court. 21 Q. And referencing the final page of this exhibit, 22 it states that: Certification of funds available for the 23 amount of \$196,441.08. 24 Was this the amount paid to the Challenge of 25 Tarrant County under this contract?</p>	<p style="text-align: right;">Page 85</p> <p>1 ending in 038. 2 Can you please explain to me what Exhibit 15 3 is? 4 A. Exhibit 15 is the same in scope as the previous 5 Exhibit 14 with a request -- if we will continue to 6 deliver administrative services to the Family Drug Court 7 for the period October 1, 2016, through September the 30th 8 of 2017. 9 MS. AYACHI: Counsel, I'm -- I'm sorry to 10 interrupt. This is one where I have three pages to this 11 exhibit. So the Bates begins -- sorry. The first page 12 ends in 037, but I have three pages so that this document 13 ends in 039. 14 MR. FRANKLIN: What exhibit does that one 15 conclude in? 16 MS. AYACHI: According to the docu- -- the 17 digital copy I'm looking at right now, it ends in 039, and 18 you indicated that it ends in 038. 19 MR. FRANKLIN: Well, I'm not going to use 20 what's going on in 039, only through 38. 21 Are you going to object to this exhibit? 22 MS. AYACHI: No. I'm looking at it. I can 23 see that the date is 2012 in that last page, so it 24 probably arrived to us in this format. I won't object to 25 the use of this exhibit as you have it.</p>

<p style="text-align: right;">Page 86</p> <p>1 MR. FRANKLIN: Okay.</p> <p>2 BY MR. FRANKLIN:</p> <p>3 Q. Yes. So, please -- I want to point your</p> <p>4 attention to the page that ends in 38.</p> <p>5 Notice that there are two line items for</p> <p>6 charges on this document. What is the difference between</p> <p>7 the two items that are being charged?</p> <p>8 A. (Witness examines document.)</p> <p>9 I do not know why this purchase order was</p> <p>10 split in this fashion.</p> <p>11 Q. Okay.</p> <p>12 (Exhibit 16 was marked for identification.)</p> <p>13 BY MR. FRANKLIN:</p> <p>14 Q. So we'll move to Exhibit 16, Bates Number</p> <p>15 CHAL0000045, and concluding with Bates number terminating</p> <p>16 in 050.</p> <p>17 A. (Witness examines document.)</p> <p>18 Q. Again, is this a Contract for Services for the</p> <p>19 Family Recovery Court?</p> <p>20 A. Yes, sir.</p> <p>21 Q. Let me point your attention to page 5 of 6, Bates</p> <p>22 number ending 049.</p> <p>23 Is this your signature on this page?</p> <p>24 A. It is.</p> <p>25 Q. And on Bates number ending in 050, it says: The</p>	<p style="text-align: right;">Page 88</p> <p>1 And the next pages appear to be a duplicate</p> <p>2 copy of the contract.</p> <p>3 0000066 seem -- appears to be the request</p> <p>4 for -- made by the County to Challenge regarding extending</p> <p>5 the contract through September 30th of 2020. 0000067</p> <p>6 appears to be a request for a copy of the single audit</p> <p>7 from Texas Health and Human Services. 68 appears to be a</p> <p>8 duplicate for the request to extend the contract. This</p> <p>9 appears to be yet another copy of the contract.</p> <p>10 Q. Going back to the first page of the exhibit, it</p> <p>11 says: The total value of it -- of the contract was</p> <p>12 \$205,932.</p> <p>13 Was this the amount that Tarrant County paid</p> <p>14 to the Challenge of Tarrant County?</p> <p>15 A. It is.</p> <p>16 (Exhibit 18 was marked for identification.)</p> <p>17 BY MR. FRANKLIN:</p> <p>18 Q. All right. Moving to Exhibit 18, which begins in</p> <p>19 Bates number CHAL0000076 through Bates number terminating</p> <p>20 in 085, what is this document?</p> <p>21 A. It is the document from Tarrant County requesting</p> <p>22 if Tarrant County Challenge will accept an extension of</p> <p>23 the contract for the period October 1, 2020, through</p> <p>24 September 30th, 2021. It is followed by the 1295 po- --</p> <p>25 95 form on page 77. 78 is a purchase order for those</p>
<p style="text-align: right;">Page 87</p> <p>1 certification of funds available for the amount of</p> <p>2 \$205,932.00.</p> <p>3 Is that the amount that Tarrant County paid</p> <p>4 the Challenge of Tarrant County?</p> <p>5 A. It is.</p> <p>6 Q. Okay.</p> <p>7 (Exhibit 17 was marked for identification.)</p> <p>8 BY MR. FRANKLIN:</p> <p>9 Q. Now I'll point your attention to Exhibit 17,</p> <p>10 Bates number beginning with CHAL0000051.</p> <p>11 You can take your time to review the</p> <p>12 document.</p> <p>13 A. (Witness examines document.)</p> <p>14 Q. Can you explain what this document is?</p> <p>15 A. The first page is a purchase order for services</p> <p>16 to administer the Family Recovery Court, which at that</p> <p>17 time was referred to as Tarrant County Family Drug Court.</p> <p>18 Page 0000052 through 58 appears to be the</p> <p>19 con- -- excuse me -- 57 appears to be the contract with</p> <p>20 the County for those -- for that purchase order.</p> <p>21 The next page, 0000058, appears to be the</p> <p>22 agreement between Challenge and Lena Pope for</p> <p>23 case-management services. The next page, 0000059, appears</p> <p>24 to be the consent agenda where the funds were approved by</p> <p>25 the Commissioner's Court.</p>	<p style="text-align: right;">Page 89</p> <p>1 services. The next page is a duplicate of the page before</p> <p>2 it, and it is followed page 80 through 84 -- 85 -- excuse</p> <p>3 me -- is the executed contract for those services.</p> <p>4 Q. Okay. On the first page of the exhibit, is that</p> <p>5 your signature?</p> <p>6 A. It is.</p> <p>7 Q. And did Tarrant County pay the amount of \$205,932</p> <p>8 as identified on Exhibit ending in 078?</p> <p>9 A. They did.</p> <p>10 Q. Okay.</p> <p>11 (Exhibit 19 was marked for identification.)</p> <p>12 BY MR. FRANKLIN:</p> <p>13 Q. Now introducing Exhibit 19, with Bates number</p> <p>14 starting with CHAL0000086 and concluding with Bates</p> <p>15 terminating in 091.</p> <p>16 What is this document?</p> <p>17 A. This document is a contract from Tarrant County</p> <p>18 in the amount of \$50,000 delineated in Exhibit A for the</p> <p>19 purchase of \$5,000 of testing supplies, \$35,000 for a .5</p> <p>20 FTE case manager, and \$10,000 for professional services</p> <p>21 contract for the Family Recovery Court.</p> <p>22 Q. So, Mrs. Gilley, in this instance, Tarrant County</p> <p>23 paid for the purchase of the test kits?</p> <p>24 A. They bought \$5,000 -- they paid for \$5,000 in</p> <p>25 drug-testing supplies.</p>

<p style="text-align: right;">Page 90</p> <p>1 Q. Under the other contracts, did they purchase any 2 drug kits in support of the drug court? 3 A. We would have to go back and look at each of 4 those contracts individually, but if so, it would be 5 delineated in the contract. 6 Q. Would that be standard practice for Tarrant 7 County to purchase the test -- the testing kits for the 8 Challenge of Tarrant County? 9 A. This was a particular grant that was written and 10 included those supplies. 11 Q. So the money that was used to fund the testing 12 kits were from a grant but not directly from Tarrant 13 County? 14 A. Yes, they were. They were -- the community 15 development department was issued a grant in this amount 16 for a Family Recovery Court. 17 Q. Understood. 18 (Exhibit 20 was marked for identification.) 19 BY MR. FRANKLIN: 20 Q. Okay. Now I will show you Exhibit 20, beginning 21 in CHAL0000092 and concluding in Bates number ending in 22 101. 23 Take a look at that and tell me what that 24 document is. 25 A. This is a con- -- well, this is accepting -- this</p>	<p style="text-align: right;">Page 92</p> <p>1 A. It is. 2 Q. Also looking at that page, it shows that -- the 3 certification of funds for the amount of \$322,308. Is 4 that the amount that Tarrant County paid to the Challenge 5 of Tarrant County? 6 A. Yes. 7 Q. Okay. I believe those are all of the contracts 8 that I wanted to go over. 9 In your earlier testimony, you mentioned 10 that you are responsible for the budget for the Challenge 11 of Tarrant County; is that correct? 12 A. That is correct, sir. 13 Q. Now I'm going to share with you a series of 14 exhibits, and these will be Exhibits 22, 23, 24. 15 MR. BOONE: Hey, Greg, could we get to a 16 stopping point? 17 MR. FRANKLIN: Yes. Let's take a break 18 right now. Everybody -- 19 THE VIDEOGRAPHER: All right. We're off the 20 record at 2:31 p.m. 21 (Brief recess taken.) 22 THE VIDEOGRAPHER: We are back on the record 23 at 2:41 p.m. 24 BY MR. FRANKLIN: 25 Q. Now, Mrs. Gilley, do you understand that you are</p>
<p style="text-align: right;">Page 91</p> <p>1 is stating that we will accept the contract for delivering 2 administration of the Family Drug Court for the period 3 October 1, 2021, through September 30th of 2022. The next 4 page is an executed 1295. The next page is a purchase 5 order in the amount of \$205,932. 6 Q. Let me stop you right there. 7 Did Tarrant County remit the \$205,932 in 8 support of the contract? 9 A. Yes, we did receive that amount. 10 Q. And on page 100 of this document -- well, Bates 11 number ending in 100, is that your signature? 12 A. It is, sir. 13 Q. Okay. And we can put Exhibit 20 to the side. 14 A. (Complied.) 15 (Exhibit 21 was marked for identification.) 16 BY MR. FRANKLIN: 17 Q. Now I will show you Exhibit 21 beginning with 18 Bates Number CHAL0000102 and ending in Bates terminating 19 in 106. 20 Is this a contract between Tarrant County 21 and the Challenge of Tarrant County in support of the 22 Family Drug Court? 23 A. Yes, it is. 24 Q. Is this your signature on page -- that terminates 25 Bates number ending in 106?</p>	<p style="text-align: right;">Page 93</p> <p>1 still under oath? 2 A. Yes, sir. 3 Q. What I'm now going to share with you are a series 4 of exhibits that purport to be the budget for the 5 Challenge of Tarrant County. Sequentially, it's 6 Exhibits 22 through Exhibit 28. 7 (Technical interruption.) 8 (Exhibits 22 through 28 was marked for 9 identification.) 10 BY MR. FRANKLIN: 11 Q. These are the budgets that you produced as a part 12 of your production back in November of 2022. 13 And Exhibit 22 is -- coincides with Bates 14 Number CHAL0001197. Do you see Exhibit 22? 15 A. I do. 16 Q. Is -- now, please explain to me what this exhibit 17 reflects. 18 A. There was a request in the subpoena document from 19 you that I delineate our budget and its funding sources 20 and purpose of funds. 21 Q. Okay. So looking at these different sources -- 22 and correct me if I misstate anything here -- there are 23 two line items where Tarrant County provides funds to the 24 Challenge of Tarrant County? 25 A. That is correct.</p>

<p style="text-align: right;">Page 94</p> <p>1 Q. And it's \$50,000 for the substance abuse 2 education? 3 A. And planning, community assessment, needs 4 assessments, but the -- but the bulk of it is community 5 education. 6 Q. And these services were outlined in one of the 7 prior exhibits that we discussed today? 8 A. Yes, sir. 9 Q. And then, here, the second one is for \$198,987 10 for the administration of the Family Recovery Court? 11 A. That is correct. 12 Q. Did you have any figures that predates 2016? 13 A. I have those figures. They were not requested in 14 the scope of the subpoena. 15 Q. For the line items in which Tarrant County is the 16 source of funding, is there any way to delineate how much 17 of those funds were allocated in the service of persons 18 with opioid addictions? 19 MS. AYACHI: Objection, form. 20 THE WITNESS: I do not think so. Just 21 sitting here with you right now, I don't believe that that 22 is something that would be -- would be possible to 23 delineate with any relative accuracy. 24 BY MR. FRANKLIN: 25 Q. Would it be a accurate assumption that for the</p>	<p style="text-align: right;">Page 96</p> <p>1 BY MR. FRANKLIN: 2 Q. Is there any indication that no other substance 3 abuse disorder is addressed in -- or supported in the 4 Family Recovery Court? 5 A. No. 6 MS. AYACHI: Objection, form. 7 BY MR. FRANKLIN: 8 Q. But you could give us that information if -- if 9 requested? 10 MS. AYACHI: Objection, form. 11 THE WITNESS: It could be done. It would be 12 very onerous to go back and review every client record. 13 But, yes, in point of fact, it could be obtained. 14 BY MR. FRANKLIN: 15 Q. So for 2022 there were 36 persons that have come 16 through the Family Drug Court. Would the Family Recovery 17 Court coordinator have drug-testing information on the 36 18 persons who have participated in the drug court in 2022? 19 MS. AYACHI: Objection, form. 20 THE WITNESS: That would exist, yes. 21 BY MR. FRANKLIN: 22 Q. Would the information exist for 2021? 23 A. Yes. The information exists; I did not say that 24 the information did not exist. 25 Q. So to clarify, it would be onerous to provide the</p>
<p style="text-align: right;">Page 95</p> <p>1 administration of the Family Recovery Court that the 2 entire amount funded did not go in support of persons with 3 opioid addictions? 4 MS. AYACHI: Objection, form. 5 THE WITNESS: I have no way of answering 6 that question for you. It -- I would have to literally 7 look at the record of every client and what they listed as 8 their substance of choice. 9 BY MR. FRANKLIN: 10 Q. Well, let me ask the question a different way, 11 then. What substance abuse disorders are supported 12 through the services of the Family Drug Court? 13 A. In Texas -- this is anecdotally. I'm not looking 14 at the records, but I would suggest to you that 15 opioids/methamphetamine would be the top two. 16 Q. Would it include alcohol? 17 A. We would not exclude a client whose only drug of 18 choice was alcohol, but it would be very unlikely to see 19 that individual, and that is because the precipitating 20 factors would be a CPS removal. 21 Q. Would persons coming through the Family Recovery 22 Court have addictions to marijuana? 23 MS. AYACHI: Objection, form. 24 THE WITNESS: I cannot answer that question 25 for you without reviewing every client record.</p>	<p style="text-align: right;">Page 97</p> <p>1 information on the 36 individuals for -- for 2022? 2 A. Exact- -- no. It would be onerous to go back 3 through every case file and determine if the client 4 reported opioids as a drug of choice. 5 Q. So it's also possible that none of them have 6 abused opioids? 7 A. No, that -- 8 MS. AYACHI: Objection, form. 9 THE WITNESS: -- that is not possible, 10 because I know that we have grants that have paid for 11 medication-assisted therapy. 12 BY MR. FRANKLIN: 13 Q. Please explain that. 14 A. That is -- the client is either receiving 15 methadone or some other form of medication-assisted 16 therapy to assist them in their recovery from an opioid 17 addiction. 18 Q. Could methadone be used for persons with heroin 19 addictions? 20 A. I'm not a clinician; I can't answer that question 21 for you. 22 Q. So what purposes can -- to the extent that you 23 have knowledge, that methadone could be used for? 24 MS. AYACHI: Objection, form. 25 THE WITNESS: I'm not a clinician. I simply</p>

<p style="text-align: right;">Page 98</p> <p>1 know that we have clients who have received 2 medication-assisted therapy, and I -- I wouldn't be able 3 to tell you, without looking at each client, what that 4 treatment was used for. But to say that we haven't had 5 any clients that did not have an addiction to an opioid 6 wouldn't seem realistic. 7 BY MR. FRANKLIN: 8 Q. But to your earlier testimony, you could not say, 9 with any certainty, that 100 percent of the -- the persons 10 who have come in through the Family Drug Court were 11 addicted to opioids? 12 A. I cannot. 13 MS. AYACHI: Objection, form. 14 THE WITNESS: I would have to go back. I'm 15 telling you that, anecdotally, I know that clients have 16 received medication-assisted therapy and that, typically, 17 that is a service that is provided for some type of an 18 opiate addiction. Now, what opiate, I could not tell you 19 without going back and researching every client. 20 BY MR. FRANKLIN: 21 Q. Would you consider heroin an opioid -- opiate? 22 A. Yes. 23 Q. Would you consider fentanyl an opiate? 24 A. Yes. 25 Q. So you're saying it's possible that the methadone</p>	<p style="text-align: right;">Page 100</p> <p>1 Could you take a look at those three [sic] 2 exhibits and confirm that the amounts represented to -- 3 from the funding source of Tarrant County was used to pay 4 the Challenge of Tarrant County? 5 A. Yes. We received funds from Tarrant County 6 during all of those years you mentioned. 7 Q. For the administration of the Family Recovery 8 Court, are those funds used in support of wages and 9 salaries or any other initiatives? 10 A. They are -- the entire budget of the 11 administration of the Family Recovery Court is not in 12 salaries. 13 Q. How would you prorate those dollars in accordance 14 with expenses? 15 A. I would have -- 16 MS. AYACHI: Objection, form. 17 THE WITNESS: I'm not sure I understand your 18 question, but I would have to go back to every cost center 19 for that particular funding source and allocate it 20 according to our cost centers. 21 BY MR. FRANKLIN: 22 Q. Have there been any of these funds, to your 23 knowledge, that have been used exclusively in support of 24 persons with opioid addiction? 25 MS. AYACHI: Objection, form.</p>
<p style="text-align: right;">Page 99</p> <p>1 treatment that you refer to was used to assist someone 2 with a heroin addiction? 3 A. I'm -- 4 MS. AYACHI: Objection, form. 5 THE WITNESS: I am not comfortable answering 6 that question without doing the research to back it up. 7 BY MR. FRANKLIN: 8 Q. We'll move on. 9 Let's go to Exhibit 20 -- were we on 23? 10 Yeah, Exhibit 23, Bates CHAL0001199. 11 Again, here, it shows that Tarrant County 12 spent \$50,000 for substance abuse education, and \$198,987 13 for the administration of the Family Recovery Court. 14 A. Mr. Franklin, what exhibit are you on? 15 Q. Exhibit 23. 16 A. Thank you. 17 Q. Did I represent that correctly? 18 A. You did. I had inadvertently turned two pages at 19 once. 20 Q. And just to get through the rest of these 21 exhibits, Exhibits 24, 25, 26, and 27, Bates numbers 22 ending in 1201 for Exhibit 24, Bates ending in 1204 for 23 Exhibit 25, Bates number ending in 1205 for Exhibit 26, 24 and Bates number 1207 for Exhibit 27, and Bates 1209 25 through 1210 for Exhibit 28.</p>	<p style="text-align: right;">Page 101</p> <p>1 THE WITNESS: Would you repeat that, please? 2 BY MR. FRANKLIN: 3 Q. So the funds identified in Exhibits 22 4 through 28, specifically for the -- for the funds used for 5 the administration of the Family Recovery Court, were 6 there any funds allocated to any specific initiative, 7 program, or product in support of persons with opioid 8 addiction? 9 MS. AYACHI: Objection, form. 10 THE WITNESS: Yes, there would be if the 11 individuals served during that funding cycle had opioids 12 as a drug of choice. 13 BY MR. FRANKLIN: 14 Q. So it would be a function of the person being 15 served -- person being served addiction -- let me say that 16 a little differently. 17 It all depends on whether a person was 18 addicted to opioids that you can say that X amount of 19 funds was dedicated to that person? 20 MS. AYACHI: Objection, form. 21 THE WITNESS: Yes, that is correct. And it 22 would be difficult to delineate that because the only 23 thing that -- the only way you could do that would be to 24 take each client and allocate the same amount of resources 25 to them, which -- as an example, in a classroom, one child</p>

<p style="text-align: right;">Page 102</p> <p>1 may require more than another child requires. And so I 2 can't say to you that the only reasonable way to do this 3 would be to take it and literally say that everybody 4 needed the same thing. And then you would divide it 5 somehow by the number of people with -- 6 BY MR. FRANKLIN: 7 Q. Would the cost of purchasing methadone be 8 included in any of these figures? 9 A. No, it would not. That was purchased through a 10 grant through the Substance Abuse and Mental Health 11 Services Administration. 12 Q. Would any residential services in support of 13 someone addicted to opioids be included in that number? 14 MS. AYACHI: Objection, form. 15 THE WITNESS: No. It -- not the -- not 16 these funds, no, it would not. Because the clients' 17 treatment services -- treatment services are paid for by 18 the Department of State Health Services. 19 BY MR. FRANKLIN: 20 Q. Okay. So the treatment services are excluded 21 from -- or the amount for the treatment services are 22 excluded from the dollars identified under the 23 administration of Family Recovery Court? 24 A. That is correct. 25 Q. For the participants who come in through the</p>	<p style="text-align: right;">Page 104</p> <p>1 counterfeit and laced with a fatal dose of fentanyl, and 2 it also says: The Drug Enforcement Administration has 3 estimated that three out of five tablets, such as Vicodin, 4 OxyContin, and Xanax, which were not purchased from a 5 pharmacy, are fake and laced with deadly levels of 6 fentanyl. 7 My question for you -- so only to the extent 8 that you have knowledge -- are you able to make any 9 distinction between a counterfeit synthetic opioid versus 10 a legitimately prescribed opioid? 11 MS. AYACHI: Objection, form. 12 THE WITNESS: I am not. 13 BY MR. FRANKLIN: 14 Q. Do you have any reason to disagree with what I 15 stated that the Drug Enforcement Administration has 16 estimated that three out of five tablets, such as Vicodin, 17 OxyContin, and Xanax, which were not purchased from a 18 pharmacy, are fake and laced with deadly levels of 19 fentanyl? 20 A. I do not disagree. 21 Q. Outside of the information that is being 22 presented on the website, have you heard of any issues 23 supporting that counterfeit opioids are a problem in 24 Tarrant County? 25 MS. AYACHI: Objection, form.</p>
<p style="text-align: right;">Page 103</p> <p>1 Family Recovery Court, is there a -- a way for the 2 Challenge of Tarrant County to identify the source of 3 drugs -- or source of opioids that the person may have 4 taken? 5 A. No. 6 MS. AYACHI: Objection, form. 7 BY MR. FRANKLIN: 8 Q. Have you ever heard of any allegations that would 9 suggest that anyone who have participated in the Family 10 Recovery Court have received prescription opioids from one 11 of the defendants? 12 A. I do not know. 13 Q. I'm going to show you Exhibit 29, which is a pull 14 from your website, https://challengetc.org/naxalone. 15 MR. FRANKLIN: And for the purposes and 16 benefit of Leila, this would have been the document named 17 T9 Challenge: Image from website of counterfeit pills. 18 MS. AYACHI: Perfect. Thank you. Got it. 19 (Exhibit 29 was marked for identification.) 20 BY MR. FRANKLIN: 21 Q. Mrs. Gilley, I pulled this from your -- your 22 website. I'll give you a few seconds to see if it's 23 familiar to you. 24 A. Yes, it is. 25 Q. And here it says: Three of these pills are</p>	<p style="text-align: right;">Page 105</p> <p>1 THE WITNESS: I would have to go back and 2 research the number of overdoses that -- I couldn't answer 3 that question for you at this very moment. Not that it's 4 not a reasonable question; I just don't have that 5 information. 6 BY MR. FRANKLIN: 7 Q. If the Challenge of Tarrant County had to design 8 a program specifically to address the opioid challenge of 9 Tarrant County, what would that look like? 10 MS. AYACHI: Objection, form. 11 THE WITNESS: It would look like -- it would 12 have certain elements to it, certainly. One element would 13 be that people are keenly aware of the potential addictive 14 nature of opioids. Number two, it would certainly be 15 educating them about safe disposal, not flushing unused 16 medications down the toilet where it goes into the water 17 supply, but disposing of them in a way that they can be 18 safely disposed of. It would be educating the community 19 about a number of ways in which medications could be taken 20 or used in a household. It would be teaching people how 21 to safely deal with someone who is having an overdose in 22 such a way that it was able to -- that they were able to 23 potentially save that individual's life, and it would 24 include ways in which the public could assist that 25 individual in finding medical care, short-term, and then</p>

<p style="text-align: right;">Page 106</p> <p>1 care for the potential addiction that they might be 2 dealing with. It would also teach young people to be very 3 careful about what they take, just an effort to make us 4 all more aware and have the ability to assist those who 5 are in a crises. 6 BY MR. FRANKLIN: 7 Q. What would be the staff requirement to design and 8 implement what you just mentioned? 9 A. You would want someone who was a certified 10 prevention specialist who, hopefully, had experience in 11 health and human services, who knew best practices in 12 community education or public health. I would say 13 probably the best product would be created by a 14 collaboration of individuals, public health, community 15 education, clinicians. 16 Q. So you would include other resources outside of 17 personnel with the Challenge of Tarrant County? 18 A. Yes. 19 Q. How many staff persons would you dedicate to such 20 efforts? 21 MS. AYACHI: Objection, form. 22 THE WITNESS: I would need to know more 23 about the scope of the endeavor. Are you -- are you 24 providing -- that is not a one presentation that you just 25 identified. When our staff are going to train parents in</p>	<p style="text-align: right;">Page 108</p> <p>1 Q. Okay. 2 MS. AYACHI: That's all I wanted to ask you. 3 Thank you so much for your time today. We 4 really appreciate it and the work that you do for Tarrant 5 County. We hope you have a wonderful weekend. 6 THE WITNESS: Thank you very much. I hope 7 you do as well. 8 MR. FRANKLIN: And thank you so much. 9 MS. AYACHI: Thank you, ma'am. 10 MR. FRANKLIN: We can go off the record. 11 THE VIDEOGRAPHER: All right. We are off 12 record at 3:18 p.m. 13 (Deposition concluded at 3:18 p.m.) 14 15 16 17 18 19 20 21 22 23 24 25</p>
<p style="text-align: right;">Page 107</p> <p>1 a school district or when they are going to train officers 2 or school nurses or the neighborhood association, those 3 are all very different presentations that are designed to 4 meet the needs of a specific audience. 5 MR. FRANKLIN: Now, let's go off record for 6 a few minutes. I just want to take a look at my notes. 7 THE VIDEOGRAPHER: We are off the record at 8 3:12 p.m. 9 (Brief recess taken.) 10 THE VIDEOGRAPHER: We are back on the record 11 at 3:17 p.m. 12 MR. FRANKLIN: Okay. Mrs. Gilley, I really 13 appreciate your -- your time today. At this moment, I 14 have no further questions for you, and I'll pass it over 15 to counsel -- Plaintiffs' counsel, if you have any 16 additional questions for Mrs. Gilley. 17 MS. AYACHI: Mrs. Gilley, I do not have any 18 other questions, but just the one. 19 CROSS-EXAMINATION 20 BY MS. AYACHI: 21 Q. Is there any reason why you would not be able to 22 testify if you were called to trial in this action? 23 A. I don't have any physical reasons why I wouldn't 24 be able to testify. I guess the answer is: No, I would 25 not have any reason not to testify.</p>	<p style="text-align: right;">Page 109</p> <p>1 IN THE UNITED STATES DISTRICT COURT, 2 FOR THE NORTHERN DISTRICT OF OHIO 3 EASTERN DIVISION 4 IN RE: NATIONAL PRESCRIPTION) MDL No. 2804 5 OPIATE LITIGATION) 6) 7) 8 THIS DOCUMENT RELATES TO:) 9 Track Nine: Tarrant County,) Case No.: 17-md-2804 10 Texas) 11) 12 (Case No. 1:18-op-45274-DAP)) Judge Dan Aaron Polster 13) 14 REPORTER'S CERTIFICATION 15 ORAL & VIDEOTAPED & VIA ZOOM VIDEOCONFERENCE 16 DEPOSITION OF 17 JENNIFER GILLEY 18 FRIDAY, AUGUST 18, 2023 19 I, Kari J. Behan, CSR, RPR, CRR, and in and for the 20 State of Texas, do hereby certify that the facts as stated 21 by me in the caption hereto are true; 22 That there came before me the aforementioned named 23 person, who was by me duly sworn to testify the truth 24 concerning the matters in controversy in this cause; 25 And that the examination was reduced to writing by computer transcription under my supervision; that the deposition is a true record of the testimony given by the witness. I further certify that I am neither attorney or counsel for, nor related to or employed by, any of the parties to the action in which this deposition is taken, and further that I am not a relative or employee of any attorney or counsel employed by the parties hereto, or financially interested in the action. Given under my hand and seal of office on this 11th day of September 2023 <i>Kari J. Behan</i> Kari J. Behan, CSR, RPR, CRR Texas CSR NO. 8564; Expiration Date: 7-31-2024 VERITEXT LEGAL SOLUTIONS Firm Registration No. 571 Telephone: (800) 336-4000</p>

<p style="text-align: right;">Page 110</p> <p>1 Veritext Legal Solutions 2 1100 Superior Ave 3 Suite 1820 4 Cleveland, Ohio 44114 5 Phone: 216-523-1313 6 7 September 11, 2023 8 9 To: Sadie Turner 10 11 Case Name: National Prescription Opiate Litigation - Track 9 (Tarrant 12 County) v. 13 Veritext Reference Number: 6059372 14 Witness: Jennifer Gilley Deposition Date: 8/18/2023 15 16 Dear Sir/Madam: 17 18 Enclosed please find a deposition transcript. Please have the witness 19 review the transcript and note any changes or corrections on the 20 included errata sheet, indicating the page, line number, change, and 21 the reason for the change. Have the witness' signature notarized and 22 forward the completed page(s) back to us at the Production address 23 shown 24 above, or email to production-midwest@veritext.com. 25 If the errata is not returned within thirty days of your receipt of this letter, the reading and signing will be deemed waived. Sincerely, Production Department NO NOTARY REQUIRED IN CA</p>	<p style="text-align: right;">Page 112</p> <p>1 DEPOSITION REVIEW 2 CERTIFICATION OF WITNESS 3 4 ASSIGNMENT REFERENCE NO: 6059372 5 CASE NAME: National Prescription Opiate Litigation - Track 9 (Tarrant County) v. 6 DATE OF DEPOSITION: 8/18/2023 7 WITNESS' NAME: Jennifer Gilley 8 In accordance with the Rules of Civil 9 Procedure, I have read the entire transcript of 10 my testimony or it has been read to me. 11 I have listed my changes on the attached 12 Errata Sheet, listing page and line numbers as 13 well as the reason(s) for the change(s). 14 I request that these changes be entered 15 as part of the record of my testimony. 16 17 I have executed the Errata Sheet, as well 18 as this Certificate, and request and authorize 19 that both be appended to the transcript of my 20 testimony and be incorporated therein. 21 22 _____ 23 Date Jennifer Gilley 24 25 Sworn to and subscribed before me, a Notary Public in and for the State and County, the referenced witness did personally appear and acknowledge that: They have read the transcript; They have listed all of their corrections in the appended Errata Sheet; They signed the foregoing Sworn Statement; and Their execution of this Statement is of their free act and deed. I have affixed my name and official seal this _____ day of _____, 20____. _____ Notary Public _____ Commission Expiration Date</p>
<p style="text-align: right;">Page 111</p> <p>1 DEPOSITION REVIEW 2 CERTIFICATION OF WITNESS 3 4 ASSIGNMENT REFERENCE NO: 6059372 5 CASE NAME: National Prescription Opiate Litigation - Track 9 (Tarrant County) v. 6 DATE OF DEPOSITION: 8/18/2023 7 WITNESS' NAME: Jennifer Gilley 8 In accordance with the Rules of Civil 9 Procedure, I have read the entire transcript of 10 my testimony or it has been read to me. 11 I have made no changes to the testimony 12 as transcribed by the court reporter. 13 14 _____ 15 Date Jennifer Gilley 16 Sworn to and subscribed before me, a 17 Notary Public in and for the State and County, 18 the referenced witness did personally appear 19 and acknowledge that: 20 21 They have read the transcript; 22 They signed the foregoing Sworn 23 Statement; and 24 Their execution of this Statement is of 25 their free act and deed. I have affixed my name and official seal this _____ day of _____, 20____. _____ Notary Public _____ Commission Expiration Date</p>	<p style="text-align: right;">Page 113</p> <p>1 ERRATA SHEET 2 VERITEXT LEGAL SOLUTIONS MIDWEST 3 ASSIGNMENT NO: 6059372 4 PAGE/LINE(S) / CHANGE /REASON 5 _____ 6 _____ 7 _____ 8 _____ 9 _____ 10 _____ 11 _____ 12 _____ 13 _____ 14 _____ 15 _____ 16 _____ 17 _____ 18 _____ 19 _____ 20 _____ 21 Date Jennifer Gilley 22 SUBSCRIBED AND SWORN TO BEFORE ME THIS _____ 23 DAY OF _____, 20____. 24 _____ 25 Notary Public _____ Commission Expiration Date</p>